



EDWARD WILSON
PRIMARY SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY

**(including safer recruitment, allegations against
staff and low-level concerns)**

Policy reviewed – September 2026

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Important Safeguarding Contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Miss H. Desmarais	Contact via the school office on 020 3214 3930 or office@edwardwilson.org.uk
Deputy Safeguarding Leads (DDSL)	Ms K. Lawrence Ms J. Costello-Tully <i>(maternity leave until March 2027)</i> Miss J. Ling	Contact via the school office on 020 3214 3930 or office@edwardwilson.org.uk
Chair of Governors	Mr Simon Mair	chair@edwardwilson.org
Local Authority Designated Officer (LADO) Operations Manager	Ms Sally Smith	LADO@westminster.gov.uk 020 7641 7668
Senior Local Authority Designated Officer (LADO) RBKC and Westminster	Mr Aqualma Daniels	Aqualma.Daniel@rbkc.gov.uk 07870 481712

1. Aims

Edward Wilson Primary School is committed to the safeguarding of all pupils at our school. The policy aims to create a culture of vigilance whereby all adults are aware of how we safeguard our pupils and adults promote the child's welfare at all times.

Edward Wilson Primary School aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

An overview of the school's contextual safeguarding information can be found in **Appendix 1**.

Mission Statement

At Edward Wilson Primary School, we want all pupils to feel listened to, safe and secure. All adults are encouraged to report any concerns they have to the Designated Safeguarding Lead (Ms H. Desmarais), or one of the deputies in her absence. Further to this, staff are aware of who they can report concerns to in 'exceptional circumstances'. Pupils who have been abused, or are at risk of abuse, are well supported throughout their time at our school and know of a range of adults at school who they can talk to with any concerns. Safeguarding is a key part of our curriculum in all year groups. Teaching and learning pertaining to safeguarding is taught across a range of subjects including R.E., PSHE and computing. At Edward Wilson Primary School, pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).

Our School Values

At Edward Wilson Primary School, we pride ourselves on developing a positive ethos built on the foundations of our school values:

- Respect:** Our school is underpinned by the principle of respect. We conduct ourselves calmly, politely and with an openness to and celebration of difference. All members of our school, including pupils, staff, governors, visitors and the wider community, should be treated with respect. We hold politeness in high regard and we are accepting of each individual's uniqueness.
- Kindness:** We demonstrate kindness towards every child. We accept our pupils as they are, and work to develop warm, fair and professional relationships with every one of them. We promote and support children's wellbeing to support their growth and development
- Community:** We identify and solve problems together, with families and children. We listen to everyone's view and put realistic, positive plans in place.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2026\)](#), and the [Maintained schools: governance guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils

may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

- [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children

This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

Our school procedures for safeguarding children will always be compliant with the **London Safeguarding Children Procedures** produced by the Local Safeguarding Children Partnership (LSCP). These procedures are available [here](#).

The Safeguarding and Child Protection policy will be reviewed at least annually and each time any subsequent guidance is issued by the Secretary of State.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

All staff should be aware of the indicators of abuse, neglect and exploitation and modern slavery (see [Modern slavery guidance](#) for information), understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All school staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Signs and symptoms of abuse and neglect – All staff will receive annual training in the signs and symptoms of abuse and neglect. All staff, including learning support assistants who often work on a one-to-one basis, are aware that our pupils with SEND or disabilities face additional safeguarding challenges and monitor these pupils closely and frequently meet with parents to discuss any concerns or arising issues. The definitions, signs and symptoms of the four kinds of abuse (sexual abuse, physical abuse, emotional abuse and neglect) are detailed in **Appendix 2**.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. **Appendix 2** explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social

Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 Roles and responsibilities - All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance [Keeping Children Safe in Education](#) (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy, code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputy safeguarding lead (DDSL), the behaviour policy, the online safety policy, the positive mental health policy and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The family help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from

or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 2 of this policy outlines in more detail how staff are supported to do this.

5.2 Roles and responsibilities - The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Ms H. Desmarais (Assistant Headteacher – Pastoral Lead, Senior Mental Health Lead and Designated Teacher). The DSL takes lead responsibility for child protection and wider safeguarding in the school. Aisha Qureshi is our Online Safety Lead, responsible for online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online (see our separate Online Safety policy for more information).

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the deputy DSLs are Katy Lawrence (Headteacher), Jade Costello-Tully (AHT and SENDco) and Jo-Anne Ling (AHT) – will act as cover. The DSLs can be contacted via the school office on 0203 214 3930 or office@edwardwilson.org.uk.

If the DSL and deputies are not available or absent, we have cover arrangements in place. This includes:

- Contacting the Deputy DSLs via the school office (see details above)
- Contacting the School Business Manager (who is part of the SLT) via the school office
- Contact via a shared mailbox, so that the deputy DSLs can act on safeguarding concerns

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- The DSL is also the Prevent Lead. Staff receive Prevent training annually, where possible, or at least every 18 months

The DSL will also:

- The DSL is also the first point-of-call for staff who have safeguarding concerns
- The DSL and deputy DSLs will receive annual training on leading safeguarding
- Keep the Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 Roles and responsibilities - The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Our link Governor, to monitor the effectiveness of this policy in conjunction with the full governing board is Amy Polglase. Amy can be contacted via the school office on 0203 214 3930.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the Online Safety Lead, DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with the Online Safety Lead (Aisha Qureshi), IT staff and service providers to identify what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Section 17 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see Section 17.2).

All governors will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 19.3 of this policy has information on how governors are supported to fulfil their role.

5.4 Roles and responsibilities - The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see section 17.1)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable

- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

Virtual School Heads manage pupil premium plus for looked after children; and receive this funding based on the latest published number of children looked after by the local authority. In maintained schools and academies, the designated teacher should work with the Virtual School Head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher should also work with the Virtual School Head to promote the educational achievement of previously looked after children. In other schools, an appropriately trained teacher should take the lead.

As with designated teachers, following the commencement of sections 4 to 6 of the Children and Social Work Act 2017, Virtual School Heads have responsibilities towards children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales. Their primary role for this group will be the provision of information and advice to relevant parties.

Statutory guidance on Promoting the education of looked-after and previously looked-after children contains further information on the roles and responsibilities of Virtual School Heads.

In addition to their statutory duties, the role of Virtual School Heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

In offering advice and information to workforces that have relationships with children with social workers, Virtual School Heads should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children. This should include designated safeguarding leads, social workers, Headteachers, governors, special educational needs co-ordinators (SENCOs), mental health leads, other local authority officers, including Designated Social Care Officers for SEND, where they exist.

In September 2024, the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on [Promoting the education of children with a social worker](#) and

children in kinship care arrangements contains further information on the roles and responsibilities of Virtual School Heads.

5.6 The Designated Teacher (DT)

Governing bodies of maintained schools and proprietors of academies must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience. In other schools, an appropriately trained teacher should take the lead.

Statutory guidance: [Designated teacher for looked-after and previously looked-after children](#) contains further information on the role and responsibilities of the designated teacher.

The Designated Teacher is Ms H. Desmarais (DSL and Assistant Headteacher).

6. Confidentiality

Information about pupils given to us by the children themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a “need to know” basis in order to support the child if that is necessary and appropriate. We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the child and overrides any other duties we have regarding confidentiality and information sharing. We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main pupil record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school to which the pupil transfers. Information sharing will always be with the right people between and within agencies.

When sharing information within our school, the 3 safeguarding partners and other agencies as required, we ensure:

- Timely information-sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children’s social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [Information Sharing Duty](#) will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. Confidentiality is also addressed in this policy with respect to record-keeping in section 18, information sharing in **Appendix 6** and allegations of abuse against staff in section 17.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for family help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

All staff should be aware of systems within their school which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing
- safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods

All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see section on 'safer recruitment' for further information) at induction. The training should be regularly updated. In addition, **all** staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Link to the GOV.UK webpage for reporting child abuse to your local council:
<https://www.gov.uk/report-child-abuse-to-local-council>.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Staff should bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

Concerns will be recorded using CPOMS to alert the DSL of a concern. However for urgent concerns, a face-to-face conversation will take place in order for the DSL to take the appropriate actions. Volunteers or staff without access to CPOMS, will record their concern on a concern form. These concern forms will be handed to the DSL or emailed directly to her.

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2a of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action.

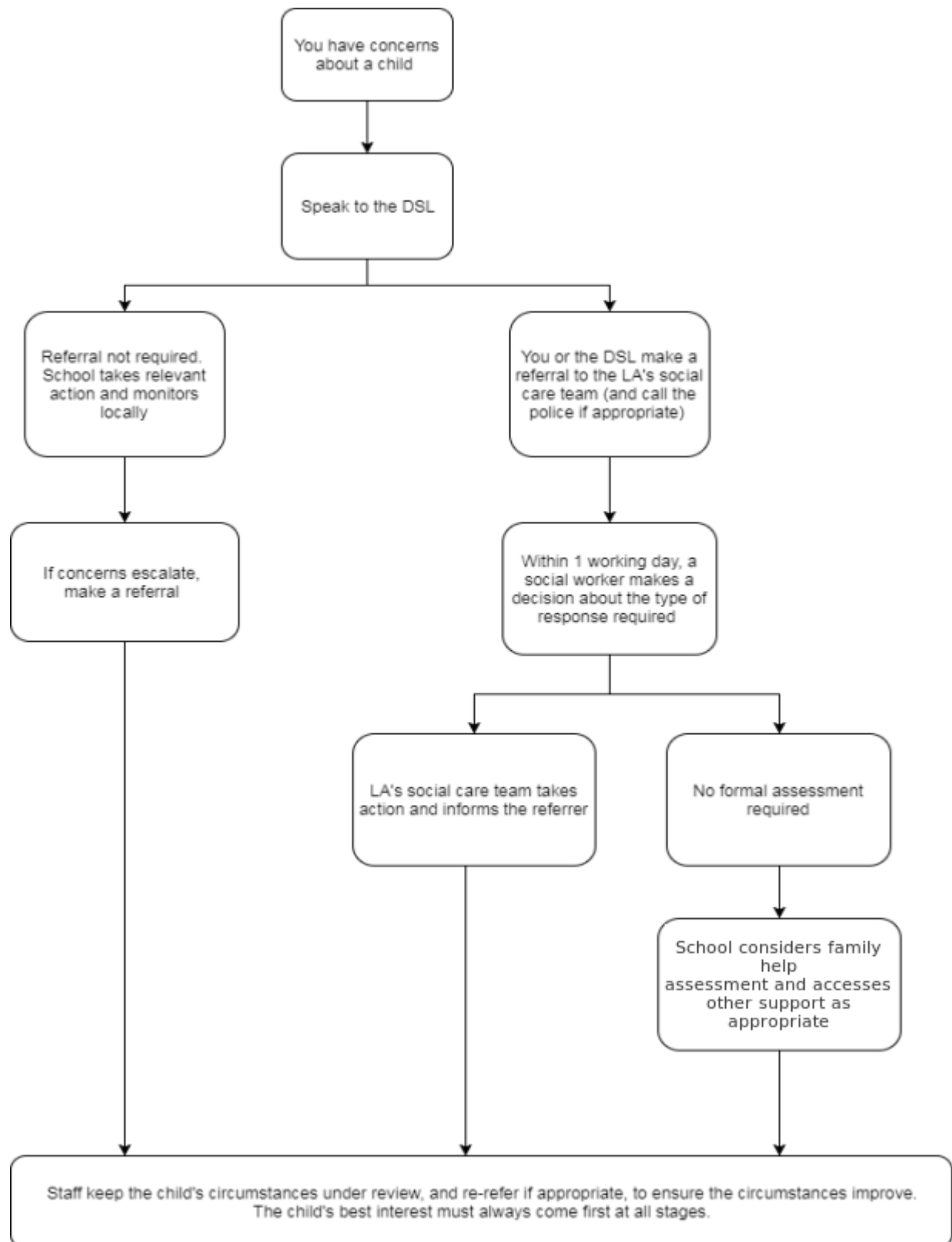
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



Family Help assessment

If a family help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a family help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

All staff should be aware of the process for community-based Family Help assessments:

- The criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:
- Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
- Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)
- the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
- Section 31 of the Children Act 1989 (care and supervision orders),

and

- Section 20 of the Children Act 1989 (duty to accommodate a child)

and clear procedures and processes for cases relating to:

- the abuse, neglect, and exploitation of children
- children managed within the youth secure estate
- disabled children

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes

of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. As outlined in Working Together to Safeguard Children, local authorities, with their safeguarding partners and any relevant agencies, should develop, agree and publish local protocols for assessments and support. This should set out who can act as lead practitioner in supporting children and their families under section 17 (which is not limited to social workers).

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation.

What will the local authority do?

Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- The child requires immediate protection and urgent action is required,
- Any services are required by the child and family and what type of services,
- The child is in need and should be assessed under section 17 of the Children Act 1989. [Working Together to Safeguard Children](#) provides details of the assessment process,
- There is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. [Working Together to Safeguard Children](#) provides details of the assessment process, and
- Further specialist assessments are required to help the local authority to decide what further action to take.

The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment, supported by the designated safeguarding lead (or a deputy) as required.

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Early help

In line with managing internally, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead

(and their deputies) know what the local early help process is and how and where to access support.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Support before statutory intervention

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism

- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child

Community-based Early Help assessment

If children do not require the support of statutory children's services, the designated safeguarding lead (or a deputy) will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate.

Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in [Working Together to Safeguard Children](#). Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including section 17.

Multi-agency working

Schools have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).

Safeguarding partners (the local authority; Integrated Care Boards (previously known as clinical commissioning group) for an area within the local authority; and the chief officer of police for an area any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement the safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need.

Statutory children's social care assessments and services

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care and if appropriate the police, (see when to call the police:

[guidance](#) for schools: npcc.police.uk) is made immediately. Referrals should follow the local referral process.

Local authority children's social care assessments should consider where children are being harmed in contexts outside of the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

The online tool [Report child abuse to your local council](#) directs to the relevant local authority children's social care contact details.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Figure 2 below details local procedures for referral and escalation.

Figure 2 - local procedures for referral and escalation.

BI-BOROUGH SAFEGUARDING REFERRAL PATHWAY

For schools and colleges in Kensington and Chelsea and Westminster

A3 QUICK-REFERENCE POSTER | SEPTEMBER 2026

IMMEDIATE DANGER OR SERIOUS, IMMINENT RISK: CALL 999, THEN CONTACT CHILDREN'S SOCIAL CARE

1. SAFEGUARDING CONCERN IDENTIFIED

Listen, reassure, do not investigate. Make a factual record using the child's own words.



2. REPORT TO THE DSL IMMEDIATELY

Do not assume someone else will act. If the DSL is unavailable, follow policy and take action.



NO DELAY

Anyone can refer directly if a child is at risk and the DSL is unavailable or appropriate action is not taken.

3. DSL REVIEWS RISK AND NEED

Use the pan-London Threshold of Need. Record rationale, action, advice and timescales.



LEVEL 1

UNIVERSAL

Needs met through inclusive universal services. Continue support, monitor and record.

LEVEL 2

FAMILY HELP

Emerging or additional needs. Discuss with family, coordinate support and make a Family Help referral where appropriate.

LEVEL 3

CHILD IN NEED

Complex or multiple needs. Refer to Children's Social Care for assessment and coordinated statutory support.

LEVEL 4

CHILD PROTECTION

Reasonable cause to suspect significant harm. Refer immediately to Children's Social Care. Call first if urgent.

RBKC: CHILDREN'S SOCIAL CARE

020 7361 3013 | Mon-Fri, 9am-5pm

Outside office hours: 020 7373 2227

Use the RBKC Social Care Portal for professional referrals.

WCC: ACCESS TO CHILDREN'S SERVICES

020 7641 4000 | Mon-Fri, 9am-5pm

Outside office hours: 020 7641 2388

Use the Social Care Portal and Westminster MARF route.

4. SHARE

Give clear, specific information about risks, history, protective factors and action taken.

5. RECORD

Log the concern, decision, referral, advice, consent discussion and outcome securely.

6. FOLLOW UP

Confirm receipt and outcome. If risk remains, contact Children's Social Care again.

7. ESCALATE

Use the LSCP Escalation Protocol where disagreement or unresolved risk remains.

KCSIE 2026: SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

Act immediately. Do not promise confidentiality. Share information lawfully. Consent uncertainty must not delay protection.

CONCERNS OR ALLEGATIONS ABOUT AN ADULT WORKING WITH CHILDREN

Inform the headteacher or principal immediately, or the chair of governors if the concern relates to the headteacher. Do not investigate. Contact the LADO without delay where the allegation indicates harm, a possible criminal offence, risk of harm, or possible unsuitability to work with children.

RBKC LADO

020 7361 2120 | lado@rbkc.gov.uk

WESTMINSTER LADO

020 7641 7668 | lado@westminster.gov.uk

Sources: KCSIE 2026; Working Together to Safeguard Children; London Safeguarding Children Procedures and Thresholds; LSCP Escalation Protocol; local referral pages.

Display alongside your school safeguarding policy and named DSL details. Verify contacts periodically.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Prevent duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard ('having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions) to the need **to prevent people from becoming terrorists or supporting terrorism**". "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act). This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Staff to follow the Westminster Prevent referral steps:

1. Speak to your safeguarding lead.
2. Refer to your Local Authority PREVENT team (prevent@westminster.gov.uk)
3. Report directly to the Police on 101, 999, or online met.police.uk report a crime or contact us.
4. Contact the PREVENT advice line 0800 011 3764
5. Contact the anti-terror hotline on 0800 789 321
6. Contact Crimestoppers anonymously on 0800 555 111

7.6 If you have a concern about mental health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- Significant changes in behaviour,
- Ongoing difficulty sleeping,
- Withdrawing from social situations,
- Not wanting to do things they usually like, and
- Physical signs of self-harm or neglecting themselves.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Senior Mental Health Lead/DSL (Ms H. Desmarais) or a Deputy DSL. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carers or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

Children requiring Mental Health Support

All staff at Edward Wilson Primary School are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Early intervention is provided through Stormbreak Shine* interventions. *In each case, the pupil will be referred to Early Help/CAMHS where appropriate.*

*Stormbreak is a charity organisation integrates psychologically informed movement to promote children's mental health through early, strengths-based, and normalised approaches supported by WHO and NICE guidelines. It emphasises positive relationships, attachment, self-esteem, resilience, and emotional literacy, using developmentally tailored, evidence-based techniques rooted in neuroscience, social learning, and pedagogies like Vygotsky's scaffolding, fostering wellbeing in schools, homes, and communities. Sessions run in school are delivered by staff members. Further information about the charity can be found [here](#) and on the Stormbreak [website](#).

Education staff can support the fulfilment of 4 key roles:

- Promoting good mental wellbeing and preventing the onset of mental illness,
- Observing pupils and identifying early those who may be experiencing mental health
- Problems or being at risk of developing one,
- Ensuring early targeted support is provided, and
- Liaison with/referral to specialist services where needed.

Where support is needed, the designated safeguarding lead (or a deputy) should consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Whilst all staff are able to observe and support the mental health and wellbeing of their pupils and learners, most schools also have a mental health lead in place. Mental health leads should support settings to embed a whole school approach to mental health and wellbeing.

The Promoting children and young people's mental health and wellbeing guidance sets out how schools can help prevent mental health problems by promoting wellbeing and resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of their pupils and learners.

Education staff should consider the range of locally available support to meet the needs of children and young people. Where education staff already have access, they should make use of support from their respective Mental Health Support Team (MHST), which are in the process of being rolled out to all schools. As well as delivering evidence-based interventions for early support for mental health issues, MHSTs support mental health leads to develop their whole school approach to mental health and wellbeing, and give timely advice, liaising with external specialist services, to help children and young people to get the right support. They should also consider other support available outside of education settings that might be suitable, for example early support hubs and young futures hubs.

Schools can also access advice to [help them identify children in need of extra mental health support](#). Additional guidance and resources can be found on the [Promoting and supporting mental health and wellbeing in schools and colleges](#) website on GOV.UK.

The NHS Every Mind Matters website also contains helpful information and advice about [Looking after a child or young person's mental health](#). In addition, the [Hub of Hope](#) is the UK's leading mental health support database. It brings local, national, peer, community, charity, private and NHS mental health support and services together in one place, so that anyone struggling can find the most appropriate support.

Refer to the *Positive Mental Health policy*.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up”, or “boys being boys”, as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See **Appendix 4** for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

See **Appendix 4** for more information about child-on-child abuse.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of

leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment

- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 1. Children can show signs or act in ways they hope adults will notice and react to
 2. A friend may make a report
 3. A member of staff may overhear a conversation
 4. A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

1. Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
2. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done via a safer schools officer, a police community support officer, local neighbourhood police or dialling 101.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes at primary level in an age-appropriate way. The underlying safeguarding learning is built progressively through our PSHE and Computing curriculum, including online safety, privacy, consent, personal boundaries, safe and unsafe relationships, asking for help and knowing what to do if something online makes a child feel uncomfortable or unsafe. In Year 5, pupils are taught about safe online communication, consent and respecting our own and others' boundaries. Scenarios are used to reinforce learning for example, 'someone online asks a child to send a photo'; children consider what they should do in this situation. This is developed further in Year 6, where pupils learn about online and media influences; recognising unhealthy or unsafe relationships and respecting other people's boundaries.

Teaching follows best practice in delivering safe and effective education, including:

1. Putting safeguarding first
2. Approaching from the perspective of the child
3. Promoting dialogue and understanding
4. Empowering and enabling children and young people
5. Never frightening or scare-mongering
6. Challenging victim-blaming attitudes

Refer to further guidance on Gov.UK: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

1. Put systems in place for pupils to confidently report abuse
2. Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
3. Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
4. Pupil-friendly posters are displayed around the school (stating who the DSL and DDSL is and to tell a trusted adult if they are worried)
5. Message boxes are in classes to share concerns or worries (pupils are also encouraged to speak directly to a trusted adult)
6. Messages are re-iterated in assemblies to ensure that children feel safe to share a concern

8. Online safety and the use of mobile technology

Online safety and the school's approach to it is reflected in our *Online Safety Policy*, which includes appropriate filtering and monitoring on school devices and school networks. We are an LGFL school and therefore compliant to the KCSIE 2026. The *Online Safety Policy* also contains information on the 4Cs (content, contact, conduct, commerce), filtering and monitoring on school devices/school network and the use of mobile and smart technology.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

1. Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
2. Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
3. Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
4. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

The breadth of issues classified within online safety is considerable and ever evolving. Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Guidance to support schools to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at [Generative artificial intelligence in education](#).

The department, in partnership with the Chiltern Learning Trust and Chartered College of Teaching, have published [online resources](#) to help school staff to use AI safely and effectively. Module 3 provides important information on identifying and mitigating key risks associated with safeguarding, ethics, data protection, and intellectual property.

To meet our aims and address the risks above, we will:

1. Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
2. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
3. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
4. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
5. Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
6. Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

7. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
8. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
9. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
10. Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by [insert member of SLT responsible for filtering and monitoring] with the support of our DSL and IT support
11. Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
12. Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Mobile phone policy

All schools should be mobile phone-free environments by default; anything other than this should be by exception only. Statutory guidance on [Mobile phones in schools](#) is clear that the department expects schools to implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, break and lunchtimes. There are a number of ways in which schools can ensure that they are mobile phone-free, and it is for Headteachers to decide how best to achieve this within their own unique contexts. Examples of how schools have become mobile free are available from [Creating a mobile phone-free environment: school case studies](#).

In Early Years, as per the guidance from the [Statutory Framework for Early Years Foundation Stage](#) and [Safeguarding children and protecting professionals in early years settings: online safety considerations](#), Edward Wilson recognises that mobile phones, cameras and other electronic devices with imaging, recording or sharing capabilities can present safeguarding, privacy and data protection risks. Their use within our setting must therefore be managed in accordance with this safeguarding policy.

Personal mobile phones, cameras, tablets, smart watches and other electronic devices capable of taking photographs, making recordings or sharing information must not be used to photograph, video or record children.

Personal devices must be kept securely in the designated area and must not be used while staff are working directly with or supervising children, except where there is an agreed emergency or specific work-related reason.

Staff, volunteers, students and visitors must not use personal devices to store, transfer or share photographs, videos or other personal information relating to children. Staff must not use personal devices or personal social media or messaging accounts to communicate with children or families in connection with their role. Communication with parents and carers must take place through the setting's approved communication channels.

Photographs or videos of children taken for legitimate setting purposes must only be taken using an authorised setting device and in accordance with the setting's safeguarding, data protection and consent procedures.

Images and recordings must only be taken where there is a legitimate reason to do so and must be kept to the minimum necessary. They must be stored securely and only accessed by authorised individuals.

Images or recordings of children must not be shared through personal social media accounts, personal messaging applications or other unauthorised platforms.

Parents, carers and visitors will be informed of the setting's expectations regarding photography and recording. The setting will manage the use of cameras and mobile phones during events and activities involving children.

Any inappropriate use of a mobile phone, camera or other electronic device must be reported immediately to the Designated Safeguarding Lead (DSL) and managed in accordance with the setting's safeguarding procedures.

Where there is a concern that a device has been used to photograph, record, store or share images of a child inappropriately, this will be treated as a safeguarding concern and appropriate action will be taken.

The setting will ensure that all staff, students and volunteers are made aware of these requirements during induction and through safeguarding training. Staff will be supported to understand how these requirements apply in practice and how to raise concerns about inappropriate or unsafe use of electronic devices.

Filtering and monitoring

Refer to our Online Safety Policy for full information.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, governing bodies and proprietors should ensure their school has appropriate filtering and monitoring systems in place and ensure that a review of their effectiveness is carried out at least once every academic year.

Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age range of their

children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filtering and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.

The Department for Education's [filtering and monitoring standards](#) set out that schools should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs
- Schools can use the department's '[plan technology for your school service](#)' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools in meeting this standard. Additional guidance on "appropriate" filtering and monitoring can be found at:

UK Safer Internet Centre: <https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring>. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at [Filtering and monitoring webinars available – UK Safer Internet Centre](#).

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at [Cyber Choices](#) and [National Cyber Security Centre - NCSC.GOV.UK](#).

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Edward Wilson recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Edward Wilson will treat any use of AI to access harmful content or bully pupils in line with this policy and our *Anti-bullying, Behaviour and Online Safety Policies*.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

1. Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
2. Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- 1:1, small group support with an adult
- Individual check-ins and trusted adult support: providing regular opportunities for pupils to speak with a trusted member of staff about their wellbeing, worries or any difficulties they may be experiencing.
- Emotional and social support: targeted support to help pupils develop confidence, self-esteem, emotional regulation and positive relationships with their peers.

- Support with communication: adapting communication to meet individual needs, for example by using visual prompts, symbols, simplified language, additional processing time, communication aids, social stories or alternative methods of communication.
- Working with families and professionals: working closely with parents/carers, the SENDCo and relevant external professionals to identify barriers to communication and wellbeing and put appropriate support and reasonable adjustments in place.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

Further information can be found in the departments:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](http://councilfordisabledchildren.org.uk),
- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people, and
- [NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#) and
- [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#).

11. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Further information is provided in our statutory guidance on [supporting Pupils at School with Medical Conditions](#) and [Allergy safety in schools](#). Statutory guidance about the support that pupils with medical conditions and allergies should receive at school.

12. Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

1. Responding to unauthorised absence or missing education where there are known safeguarding risks
2. The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

1. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
2. The DSL has details of children's social workers and relevant virtual school heads

The designated teacher is Ms H. Desmarais (DSL and AHT), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

1. Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
2. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

15. Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See *Behaviour policy* for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex (“social transition”), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child’s parents/carers have been involved (as set out in [Keeping Children Safe in Education](#) (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school’s evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

1. The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child’s request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child’s wishes
2. Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
3. Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
4. The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Pupils are not allowed into toilets designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 6).

Procedure for dealing with complaints and allegations about staff, including supply teachers, volunteers and contractors

Staff at Edward Wilson Primary School understand that pupils may make allegations against a member of staff and are aware of the school procedures that manage these allegations.

If safeguarding concern or allegation (no matter how small) is made against a staff member (including supply staff, trainee teachers, volunteers, and contractors), the allegation must be referred to the Headteacher immediately. The Headteacher will discuss the allegation and seek further advice from the LADO – the Local Authority Designated Officer for Child Protection.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then:

- This should be referred to the Headteacher or principal, who will consider whether an onward referral to the LADO is required,
- Where there is a concern/allegation about the Headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school, and
- In the event of a concern/allegation about the Headteacher, where the Headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the Headteacher, this should be reported directly to the LADO(s). Details of your local LADO should be easily accessible on your local authority's website.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school's low-level concerns policy.

Low-level concerns about a member of staff, agency staff, volunteer or contractors should also be reported to the Headteacher.

The Headteacher will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and the role of the DSL, the Headteacher may wish to consult with the DSL and take a more collaborative decision making approach. Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. If the Headteacher is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with their LADO.

See **Appendix 6** managing allegations about staff. See **Appendix 8** for a flow chart about managing low level concerns in relation to staff (including supply teachers, volunteers and contractors).

Organisations or Individuals using school premises

Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools should follow their safeguarding policies and procedures, including informing the LADO.

17.2 Other complaints

Procedure for dealing with complaints and allegations about the Headteacher

Any allegation against the Headteacher needs to be reported to the Chair of Governors, Simon Mair, immediately. The Chair of Governors will discuss the allegation and seek further advice from the LADO. The Chair of Governors can be contacted by email on chair@edwardwilson.org.uk or by telephoning the school office on 0203 214 3930.

Procedure for dealing with safeguarding allegations about another pupil

Child on child abuse involves the abuse of young people by their peers. It is not tolerated at Edward Wilson Primary School and will never be treated lightly.

Members of staff should report suspected child on child abuse to the DSL in line with reporting allegations against adults as detailed in this policy. The DSL will notify the parents of all pupils involved in the allegation on the same day the allegation is made. The DSL and the school's Headteacher will investigate any allegations through speaking with staff, reading concern forms and, if necessary, taking statements from witnesses or looking at CCTV. In order to minimise child on child abuse, pupils are always supervised when they are at school and learn about

peer abuse throughout the curriculum. *For more information on child on child abuse see Appendix 4.*

17.3 Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's senior leadership team. Edward Wilson Primary School has a *Whistleblowing Policy* in place with more information.

This policy is available on the Resources Drive. A hard copy is displayed in the staffroom and additional paper copies can also be obtained, upon request, from the school office.

Other policies/documents which staff are expected to have read to uphold this policy:

- Keeping Children Safe in Education Part 1 (2023)
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Staff Handbook
- Behaviour Policy
- School Policy for Children Missing Education

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- General advice on whistleblowing can be found at [whistleblowing for employees](#), and
- the [NSPCC Whistleblowing Advice Line](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.

18. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

At our school, all paperwork and files pertaining to safeguarding and child protection are stored safely and securely away from other pupil files (this will also help if/when responding to any complaints about the way a case has been handled by the school). Records are structured with:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved and
- a note of any actions taken, decisions reached and the outcome

Records are kept in a locked cupboard which can only be accessed by the DSL or the deputy DSLs. Where records need to be transferred to the local authority or other schools, they are sent securely, separately from other files and a receipt is obtained from the receiving school or office. Other safeguarding concerns are all logged securely online using CPOMS (Child Protection Online Management System).

Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school to have support in place when the child arrives, this should be within:

1. **5 days** for an in-year transfer, or within
2. **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- A note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- A copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- A declaration on whether the information will be referred to in any future reference

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its, [The Information Commissioner Employment Practices Code](#) which provides some practical advice on record retention.

19. Training

19.1 Training - All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

1. Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
2. Be in line with advice from the 3 safeguarding partners
3. Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
4. Have regard to the Teachers' Standards to support the expectation that all teachers:
5. Manage behaviour effectively to ensure a good and safe environment
6. Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

19.2 Training – The DSL and deputies

The DSL and [deputy/deputies] will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

19.3 Training – Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

1. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
2. Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

19.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See **Appendix 9** of this policy for more information about our safer recruitment procedures.

19.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

In Early years:

The Headteacher will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

20. Monitoring arrangements

This policy will be reviewed **annually** by Ms H. Desmarais (Assistant Headteacher / DSL / SMHL) and Ms K. Lawrence (Headteacher and DDSL). At every review, it will be approved by the full governing board.

21. Links with other policies

This policy links to the following policies and procedures:

1. Behaviour and Anti-Bullying
2. Staff Code of conduct
3. Staff Handbook
4. Complaints
5. Health and safety
6. Attendance
7. Online safety (including AI, mobile phone use, filtering and monitoring)
8. Equality
9. Relationships and sex education
10. First aid (with reference to the first aid requirements set out in the EYFS statutory framework)
11. Curriculum Progression maps (particularly PSHE and Computing)
12. Privacy notices
13. Whistleblowing

Purpose: to support leaders and governors to identify the most significant contextual factors affecting pupils, evaluate their implications and agree evidence-led priorities for action.

Ward – Westbourne		Borough – Westminster
1. Key themes in our school		
Theme	Evidence	Implications
Attendance	<ul style="list-style-type: none"> 95% for 2025-26 was the highest yet, however persistent absence remains a concern and attendance contracts are in place for those families. 	<ul style="list-style-type: none"> Some of our most vulnerable pupils miss a lot of key learning, and those who have poor punctuality miss a lot of ongoing foundational learning e.g. early-morning phonics sessions The majority of our pupils with low attendance are underperforming School engagement
Safeguarding	<ul style="list-style-type: none"> Some families do not supervise their children's online activities; this has led to online bullying, access to non-age appropriate games, videos and social media content, and in one case last year the non-consensual sharing of pupils' and staff members' photographs on a social media site. The latter incident was escalated immediately to the Met, who visited the school and spoke to the pupils, conducted an investigation, which was resolved fully Some parents have misogynistic views due to the cultural background of our school e.g. the role of males being more important than women, valuing boys over girls (92% Muslim community) 	<ul style="list-style-type: none"> Our pupils sometimes do not recognise what is safe and unsafe online behaviour, and sometimes neither do their families Online harms and emerging AI-related risks Lack of recognising boundaries Education may not seem a priority for girls, girls may grow up with the view that their role is to be a domesticated housewife, rather than earning a living and having ambition for their futures
SEND	<ul style="list-style-type: none"> We have 18 pupils in Special Resource Provision (SRP) classes, all with a diagnosis of autism and some of whom are non-speaking. This brings its own vulnerabilities and responsibilities for staff to ensure these children are safe. Throughout the school, we have pupils with a range of needs, who require intensive adult support. 	<ul style="list-style-type: none"> SEND complexities and inclusion Mental health and wellbeing
Behaviour	<ul style="list-style-type: none"> Some pupils find it challenging to demonstrate good behaviour and therefore do not always demonstrate the school values 	<ul style="list-style-type: none"> New Behaviour Policy and Anti-Bullying being needed to be implemented last year to improve behaviour Mental health and wellbeing
Disadvantage	<ul style="list-style-type: none"> Pastoral register identifies vulnerable pupils (known and not known to children's services) EAL pupils – 98% PPG pupils – 60% 	<ul style="list-style-type: none"> Some disadvantaged pupils may need further support through early intervention May not be thriving academically
Other significant theme	<ul style="list-style-type: none"> Knife crime, gangs, online risks 	<ul style="list-style-type: none"> Risk of danger/threat to life Police involvement/life of crime
2. Key themes in our ward / local community		

Theme	Evidence	Implications for pupils
Demographics	<ul style="list-style-type: none"> • EAL – 61.0% • FSM – 54.3% • EHCP – 7.0% • SEN support – 16.4% • Global majority – 82.5% 	<ul style="list-style-type: none"> • Pupils may need additional support to access learning, vocabulary and classroom communication • Poverty may affect attendance, participation, enrichment and wellbeing • Pupils may require adaptive teaching, whilst remaining inclusive • Additional needs should be addressed without allowing language, poverty or SEND to become barriers to achievement or aspiration (keeping high expectations a priority)
Housing / mobility	<ul style="list-style-type: none"> • Number of families in substandard housing; we write letters of support for appropriate housing on average 4 times per half term/at least 20 a year • Homelessness; sudden moves out of borough 	<ul style="list-style-type: none"> • Attendance and punctuality is hugely impacted by this; children and parental mental health impacts from inadequate housing e.g. black mould, cramped conditions, unsuitable neighbours e.g. if in temporary hotel accommodation
Health and wellbeing	<ul style="list-style-type: none"> • 42% Year 6 children in 2025 were obese according to NHS height/weight checks • Lack of green/outdoor space for most families 	<ul style="list-style-type: none"> • Significant need for early, preventative support around healthy eating, physical activity and long-term health • Restricted opportunities for regular physical activity, outdoor play and connection with nature
Community safety	<ul style="list-style-type: none"> • Gang recruitment around the Harrow Road • Ex-pupils and older siblings of current pupils are involved in gang activity 	<ul style="list-style-type: none"> • Older boys in particular are at risk of grooming, coercion, criminal exploitation, violence and pressure to become involved in offending • Increased exposure to gang-related behaviours and make recruitment feel normalised or difficult to challenge • Fear, intimidation or involvement in gang activity can affect pupils' attendance, concentration, relationships, mental wellbeing and sense of safety • Pupils need safe, trusted adults they can approach, alongside effective safeguarding, early intervention and clear routes for reporting concerns without fear of repercussions
Community strengths	<ul style="list-style-type: none"> • Compared to schools in similar contexts, we have less mobility, as some families continue to send their children here even when they are rehoused far away 	<ul style="list-style-type: none"> • Families communicate and support each other with communication and school engagement • Long-term relationships with families can help the school understand pupils' needs and provide more consistent support over time. • Families value our school and helps pupils retain their existing support networks

3. Key themes across the borough

Theme	Evidence	Implications for schools
Attendance	<ul style="list-style-type: none"> Attendance remains below national levels Westminster primary attendance was below the England primary rate Previous Westminster analysis attendance was 93.6%, compared with 94.5% in London and 94.7% nationally, indicating a persistent local gap 	<ul style="list-style-type: none"> Children experiencing two or more of the following factors may require enhanced safeguarding oversight: <ul style="list-style-type: none"> ➤ Poverty + Poor Attendance ➤ Housing Instability + School Absence ➤ Family Help Involvement + School Absence May reduce pupils' continuity of learning, progress and engagement, with disadvantaged pupils and those with SEND potentially facing greater barriers to regular attendance.
Safeguarding priorities	<ul style="list-style-type: none"> Children are at risk of gang recruitment Serious youth violence and knife crime Child exploitation and grooming Online safety Neglect and wider family vulnerability 	<ul style="list-style-type: none"> Children experiencing two or more of the following factors may require enhanced safeguarding oversight: <ul style="list-style-type: none"> ➤ School Disengagement + Community Safety Concerns ➤ Exclusion History + Youth Violence Risk ➤ Domestic Abuse + Attendance Concerns ➤ Online Harm Indicators + Mental Health Concerns ➤ Peer-on-Peer Abuse Concerns + School Avoidance ➤ Young People Vulnerable to Exploitation + Missing Education Use Pupil Premium and wider pastoral resources to address barriers such as attendance, technology, food, enrichment and family circumstances.
SEND / inclusion	<p>2025-26 statistics:</p> <ul style="list-style-type: none"> 21.6% - SEND 1,464 EHCPs were being maintained by Westminster in May 2025, with 47% relating to pupils with autism <p>Westbourne Ward:</p> <ul style="list-style-type: none"> High level of SEND need: 1 in 5 pupils in Westminster identified SEND, Growing complexity of need: Autism - 47% of Westminster's EHCPs, 	<ul style="list-style-type: none"> Children experiencing two or more of the following factors may require enhanced safeguarding oversight: <ul style="list-style-type: none"> ➤ SEND + Persistent Absence ➤ SEND + Mental Health Needs ➤ SEND + Online Vulnerability Ensure sufficient SENCO capacity, early identification, appropriate interventions and effective coordination with families and external services Ensure adaptive teaching and reasonable adjustments are part of everyday classroom practice, not solely dependent on specialist staff Significant demand for inclusive classroom practice and targeted support
Health and wellbeing	<ul style="list-style-type: none"> Westminster has high rates of: <ul style="list-style-type: none"> ○ Obesity ○ Tooth decay ○ School absence ○ Deprivation 	<ul style="list-style-type: none"> Children experiencing two or more of the following factors may require enhanced safeguarding oversight: <ul style="list-style-type: none"> ➤ Mental Health Needs + Social Isolation

	<ul style="list-style-type: none"> • 28% social housing – higher than the London average • 2 in 5 children are overweight • Mental health – 1 in 4 adults and 1 in 5 children and young people have mental health needs • Childhood vaccinations – below the 95% coverage rate recommend by WHO 	
Other strategic themes	<ul style="list-style-type: none"> • 1 in 3 children live in poverty • With Westbourne being in North Paddington, it is within the 10% most deprived areas of the country • Deprivation driven by highly disadvantaged living environment, linking to crime, housing barriers and income. 	<ul style="list-style-type: none"> • Provide accessible communication for families with different languages and backgrounds, using interpretation or translated information where appropriate • Use pupils' multilingualism, cultural knowledge and different experiences as assets that enrich learning and the wider school community

4. What are the most significant findings?		
Key findings	Brief evidence	Leadership Implications
Themes evident at all three levels	<ul style="list-style-type: none"> • Online safety • Attendance, particularly Persistent Absence • Safe management of pupils with SEND who are dysregulated 	<ul style="list-style-type: none"> • <i>Online safety workshops are delivered for parents throughout the year</i> • <i>Online safety lessons within Computing curriculum</i> • Weekly online safety updates in newsletter
Themes unique to our school	<ul style="list-style-type: none"> • Larger number of SRP classes than average • Pupils with Visual Impairments 	<ul style="list-style-type: none"> • Ensure staff are fully trained in de-escalation, the PACE approach, therapeutic approaches and restrictive interventions. Ensure staff are trained in VI-best practice.
Protective factors and strengths	<ul style="list-style-type: none"> • Experienced SLT and governance • Very experienced and expert teaching team • Many staff members have worked here for many years and are from the local area • School values are embedded thoroughly e.g. assemblies and curriculum 	<ul style="list-style-type: none"> • Ensure that staff teams at all levels reflect the values and, as much as possible, the local community

5. Leadership priorities

Priority	Why does it matter?	How will we respond?
SEND	<ul style="list-style-type: none"> Pupils with SEND, particularly those experiencing poverty, can face greater risks around absence, suspension and disengagement, making early intervention particularly important Ensuring effective inclusion and timely support is essential to prevent additional needs becoming barriers to learning, progress and positive outcomes. 	<ul style="list-style-type: none"> SaLT advice Use of Makaton with most vulnerable pupils in SRP Trusted relationships with highly-trained staff Ensure that the teaching teams working with the most vulnerable pupils are experienced and excellent practitioners 50 members of staff are fully trained in Restrictive Interventions and CPD in SEND for all staff is ongoing Make use of Best Start In Life & Family Hubs referrals when needed Support vulnerable transitions Demand for specialist provision has meant a third SRP classroom was required this year
Online safety	<ul style="list-style-type: none"> Due to factors including deprivation and limited outdoor space, some concerns regarding children being chronically online and exposed to inappropriate content e.g. misogyny. Some families have ongoing domestic violence and exposure to online misogyny combined with witnessing this is likely to harm both boys' and girls' perceptions of healthy, consensual relationships Children can be exposed to risks including grooming, exploitation, cyberbullying, harmful content and inappropriate contact, which can have significant impacts on their safety and wellbeing For pupils vulnerable to gang recruitment or exploitation, social media and messaging platforms can provide opportunities for grooming, coercion and maintaining contact with exploiters 	<ul style="list-style-type: none"> Using school data to inform Computing and PSHE and curriculum priorities Ensure well-trained in the basics and ensure that all staff are vigilant to key signs of concern. Staff awareness that concerns in the community need to be treated and reported like safeguarding concerns Frequent pupil voice to take place to assess pupils' knowledge of online safety and raise awareness of any concerns that the school may be unaware of Parent workshops on online safety Share the importance of online safety and risks with children in lessons, assemblies, and discussions throughout the year Develop pupils' digital literacy, critical thinking and confidence to recognise and report concerns helps them make safer choices online Pupils with SEND or those experiencing disadvantage may require additional, accessible support to recognise online risks and know where to seek help
Attendance	<ul style="list-style-type: none"> Regular attendance gives pupils consistent access to teaching, relationships and routines, reducing gaps in learning and supporting academic progress Pupils experiencing poverty or with SEND may face additional barriers to regular attendance, making early identification and targeted support particularly important Regular attendance helps pupils maintain friendships, relationships with trusted adults and a strong connection to school, supporting their wider wellbeing and engagement 	<ul style="list-style-type: none"> Make use of Best Start In Life & Family Hubs referrals when needed Use attendance, SEND, safeguarding and wellbeing data and pastoral register to identify pupils at risk and intervene early Embed adaptive teaching and personalised support so pupils with SEND can access learning and participate fully Work closely with families to understand barriers and provide targeted support before absence becomes persistent Create a safe, inclusive school environment where pupils feel they belong and have trusted adults they can turn to.

Appendix 2: Definitions of child abuse

Criteria for Registration and Categories Abuse

All children have certain basic needs, which include:

- Physical care and protection
- Affection and approval
- Stimulation and approval
- Discipline and control that is consistent and appropriate to age
- The opportunity to gradually acquire self-esteem, confidence, independence and responsibility that are age appropriate.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse (Non-Accidental Injury)

Location of injury

It should not be assumed that an injury to a part of the body normally vulnerable to accidental injury has necessarily been caused accidentally – it could be non- accidental. All injuries to children, which do not easily come into the category of normal bumps and scrapes, should be seen by a doctor.

Certain parts of the body are more commonly subjected to non-accidental injury. These include the upper arm, where a child may be gripped or shaken, the back, and the buttocks. Multiple injuries of various types, ages and location are common features of physical abuse.

Most non-accidental injuries leave marks on the body. PE teachers and swimming instructors are therefore key people in the identification of this form of abuse, as they regularly see the children partially dressed.

Signs to look out for:

- Children who show a reluctance to undress or to expose parts of their bodies should be monitored as children who may have suffered physical injury
- Unexplained absences
- Physical signs of injury
- Unexplained or confused accounts of how an injury occurred
- Explanation of an injury which appears to be inappropriate to the nature and age of the injury.

Common Medical / Physical Factors Associated with Physical Abuse**a) Bruising**

- Facial bruising around the mouth and ears
- Groups of small bruises
- Black eyes without a forehead injury, particularly if both eyes are affected
- Weal marks or outline of bruising (e.g. Hand mark)
- Bruising of soft tissue with no obvious explanation (most bruises occur on bony protuberances such as the temple or shin)
- Bruises on the back, back of legs, stomach, chest or neck
- Bruises or cuts to mouth or tongue (e.g. Split frenulum)
- Pinch marks are found in pairs and may be seen on the back, buttocks, arms or cheeks

b) Bites

- Bites leave clear impressions of teeth and some bruising
- Parents sometimes claim that bites have been made by other children or animals. It is therefore important to check the size and shape of the injury. If the impression is more than 3cms across, it will have been caused by an adult or adolescent
- Bites can be inflicted almost anywhere on the body
- Bites are never accidental

c) Burns and Scalds

- Children will sometimes suffer minor burns through hot irons etc., but it is uncommon for multiple burns to be caused accidentally
- A cigarette burn is characteristically round, but may have a tail when dragged against the skin, and is surrounded by an area of inflamed skin
- Cigarette burns can be found in groups and can be found on any part of the body

- Scalds from boiling water may result from lack of supervision, or non- accidentally
- A child is very unlikely to sit down willingly in very hot water; therefore, he cannot scald a bottom accidentally without also scalding the feet
- Burns and / or scalds are particularly worrying as a degree of sadism may be involved when such injuries are inflicted

Associated Factors

- Injuries not consistent with explanation given by parent (even if agreed by the child)
- Circumstances where parent delays seeking medical advice
- A history of repeated injuries or presentation to the accident & emergency department
- Consent for a medical refused by parent
- Desire of a parent to attribute blame elsewhere
- Distant or mechanical handling of the child by the parent

Action to be taken

If a teacher has concerns that a pupil in her / his class may be suffering from physical abuse, the DSL should be informed, and detailed records kept (including dates of injuries noted). The DSL will decide if concerns should be shared with parents, and when appropriate, Social Services staff and a designated doctor should be informed

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

1. Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
2. Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
3. Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
4. Seeing or hearing the ill-treatment of another
5. Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
6. Verbal abuse such as criticism, belittling, or name-calling

Action to be taken

If a teacher is concerned that a pupil in her / his class is being emotionally maltreated, it should be reported to the DSL, detailed records should be kept, and when appropriate, Social Services staff informed by the DSL.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

1. Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
2. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Both boys and girls can suffer from sexual abuse. Both men and women can be perpetrators – boys and girls who disclose sexual abuse from a female perpetrator are often met with disbelief. It is therefore important to listen to what a child says without being judgemental. Abusers can be parents, friends, teachers, child-care workers, clergymen or strangers. Warning children about *Stranger Danger* should only form part of the child protection programme.

Signs to look out for:

- a child who demonstrates inappropriate sexual interest and activity, through play or drawings
- sexualised behaviour, masturbation and sex play which often leaves the peer group confused or embarrassed
- a child having excessive preoccupation with, or precocious knowledge of adult sexual behaviours
- a child who shows a marked fear of adults, usually men, but occasionally men and women
- a child who presents as depressed and where there may be instances of drug or alcohol abuse, suicide attempts or running away
- a child who suddenly starts to wet or soil
- a child who takes over the role of wife / mother within the family
- a child whose concentration and academic performance suddenly deteriorates
- a child who avoids medical examination or is reluctant to change for PE
- a child who has low self-esteem and few friends
- aggressive behaviour from a normally quiet child, or withdrawn behaviour from a normally boisterous child
- frequent unexplained absences or lateness

- a child who talks of nightmares and being unable to sleep; a child who may be excessively tired
- recurrent urinary tract infections
- signs of sexually transmitted infections and overall dishevelled appearance
- child who demonstrates a level of knowledge unusual for their age/development

Action to be taken

If any teacher has concerns that a child in her / his class may be suffering from sexual abuse in any form, they must discuss this with the DSL, who should then discuss it with Social Services personnel. Parents are informed about the concern, unless this could negatively impact the situation (i.e. quieten the child, putting the child at even greater risk). Detailed records should be kept, including dates and circumstances surrounding discussions.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

1. Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
2. Protect a child from physical and emotional harm or danger
3. Ensure adequate supervision (including the use of inadequate care-givers)
4. Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs to look out for:

- Dirty unkempt appearance of child, in overall poor condition
- Thin wispy hair. Underweight child, diarrhoea may indicate poor nutrition
- An undernourished child may be unduly solemn or unresponsive, or may be overeager to obtain food
- An under-stimulated child may not reach expected milestones
- Behaviour and developmental difficulties that cannot be explained by clinical factors

Associated factors

Neglected children frequently come from homes where there is:

- A parent who is lonely, isolated, unsupported or depressed
- Poor inter-parental relationship / domestic abuse
- A parent who is abusing drugs or alcohol
- A large number of children living in cramped or very poor conditions

Action to be taken

If a teacher has concerns about the wellbeing of a child in his / her class, a discussion should take place with the Designated Safeguarding Lead, records should be kept, and when appropriate Social Services staff are informed by the DSL.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Appendix 2a: Female genital mutilation (FGM)

Female Genital Mutilation is a form of child abuse and as such is dealt with under the schools Safeguarding and Child Protection policy. At Edward Wilson Primary School, the Headteacher and Governors expect Safeguarding to be everybody's responsibility and expect all staff to adhere to and follow these policies. The school uses the World Health Organisation definition as written below.

Definition of FGM:

“Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.”

(World Health Organisation-1997)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

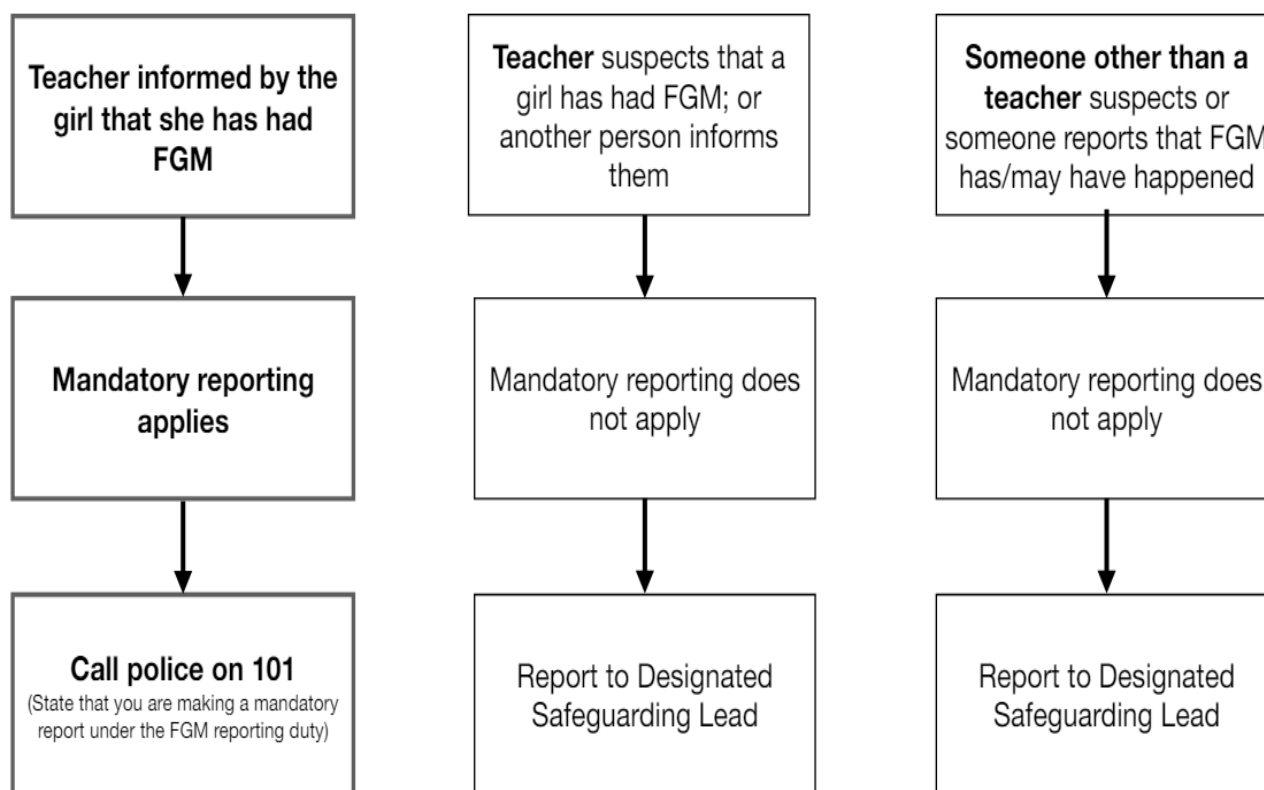
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

FGM: The law on reporting



Source: Mandatory reporting of female genital mutilation: procedural information (Home Office/DfE, January 2020)

Useful documents include:

- *Multi-Agency Practice Guidelines: Female Genital Mutilation* (HM Government, 2011)
- *Briefings and Information for Use During Inspections of Maintained Schools and Academies* (Ofsted, updated December 2012).
- Westminster Child Protection Procedure Guidelines
- *Working together to safeguard children*, HM Government (2018), paragraphs 6.14 to 6.19.1
- *Safeguarding children and safer recruitment in education*, DfE (2006), Annex A, paragraphs 39 to 42.2
- The Department for Education website;
<http://www.education.gov.uk/schools/pupilsupport/pastoralcare/childprotection/a0072224/safeguarding-children-from-female-genital-mutilation>

Appendix 3: Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

We expect all staff to be aware of and demonstrate British Values including:

- Democracy
- The rule of law
- Individual liberty and mutual respect
- Tolerance of those with different faiths and beliefs

We support children to:

- Understand the importance of free speech through PSHE lessons and assemblies
- Learn how to stay safe in school, outside of school and on the internet
- Participate in a range of community events
- Develop well-being, confidence and resilience through planned our curriculum and extra-curricular learning including clubs
- Our behaviour policy teaches impact and consequences from Nursery to Year 6

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the *Behaviour policy* and *Online Safety policy*.

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

For further guidance, refer to the [Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings](#).

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made.

To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits

- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such

as sexual abuse or exploitation or child criminal exploitation - particularly county lines, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

It is important that the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education.

These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Further information and support, includes:

- The department's statutory guidance on school attendance [Working together to improve school attendance](#) which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- General information and advice for schools can be found in the Government's [Missing Children and Adults Strategy](#).

Action

If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

See **Appendix 5** for a flow chart for raising safeguarding concerns about a child.

All staff are encouraged to work in accordance with the staff handbook. This involves not working one-to-one with a pupil without other adults or pupils in the room. Where this type of work cannot be avoided, staff must leave the door open and alert their colleagues/line manager to this beforehand. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Child criminal exploitation (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through **county lines** (county lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". Links to the Home Office's County Lines

advice can be found [here](#), Catch 22 information can be found [here](#)) working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as

being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons. Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

All staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off-site) they should speak to their designated safeguarding lead (or a deputy). As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

As well as knowing how to respond to concerns, all staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’),
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- Serious physical assault and harm, or the threat of harm with a weapon, sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- Consensual and non-consensual making or sharing of nudes and semi-nudes,
- Upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school’s approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Action to be taken

Members of staff should report suspected child on child abuse to the DSL in line with reporting allegations against adults as detailed in this policy. The DSL and class teachers will notify the parents of all pupils involved in the allegation on the same day the allegation is made. The DSL and the Headteacher will investigate any allegations through speaking with staff, reading concern forms and, if necessary, taking statements from witnesses or looking at CCTV. In order to minimise child on child abuse, pupils are always supervised when they are at school and learn about peer abuse throughout the curriculum.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own), it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:

www.actionagainstabduction.org and www.clevernevergoes.org.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behavior observed). This is the procedure set out in the statutory Operation Encompass guidance for [information sharing](#).

The DSL will provide support according to the child's needs and update records about their circumstances.

Elective Home Education (EHE)

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

In accordance with the [School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#), a school must make a return to the local authority when a pupil's name is deleted from the admission register.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that local authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of local authorities and their powers to engage with parents. Although this is primarily aimed at local authorities, schools should also be familiar with this guidance.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents

- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Staff should be aware of the importance of:

- Making clear that there is a **zero-tolerance** approach to sexual violence and sexual harassment that it is never acceptable, and it will not be tolerated. It should **never** be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

Action following a report of sexual violence and/or sexual harassment - what to consider

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of ‘it could happen here’. The school is aware of and will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The designated safeguarding lead (or deputy) is likely to have a complete

safeguarding picture and be the most appropriate person to advise on the initial response by the school. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra familial harms and any necessary support for siblings following incidents
- Are there ongoing risks to the victim, other children, adult students or school staff, and
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school will follow general safeguarding principles as set out throughout this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

Physical intervention – Physical intervention can only ever be used to prevent a pupil injuring themselves, other pupils or a member of staff. Where physical intervention is necessary, only the most minimal amount of force should be used to prevent injury. When working with pupils where there is a higher likelihood of physical intervention being needed, the school will provide additional training to staff who work with these pupils on a regular basis. When physical intervention has been required, this needs to be written on CPOMS or a concern form and reported to the DSL immediately. Parents will be informed on the same day by the DSL.

Attendance – It is the duty of class teachers to monitor the attendance and punctuality of all pupils in their class. Where they have concerns over a particular child's attendance or punctuality, this will be shared with their phase leader in the first instance who will make arrangements to meet with the family to overcome this. Where this is ineffectual or where a child is already classed as vulnerable or known to social services, this will be referred to the

DSL. In the case of pupils who are subject to child protection plans or are classed as Children Looked After (CLA), the DSL will report absences on the same day to the named social worker for that child. If absences (for any pupil) are prolonged and frequent, the family will be referred to Early Help for support or, in cases where there are additional concerns, social services. The school also asks for at least two emergency contacts when pupils are first enrolled at the school to help with this process.

Private Fostering – The school has a mandatory duty to inform the local authority of any pupil they believe is in a ‘private fostering’ arrangement. This is classed as any child who is not living with their legal guardian.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting (this is a criminal offence), and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Taking and sharing nude photographs of U18s is a criminal offence ([UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools)
- Sharing of unwanted explicit content
- Sexualised online bullying
- Unwanted sexual comments and messages, including, on social media
- Sexual exploitation; coercion and threats, and
- Coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

1. Speak to the pupil about the concerns in a secure and private place
2. Activate the local safeguarding procedures and refer the case to the local authority's designated officer
3. Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
4. Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. Further information and training for professionals on exploitation and [modern slavery is available here - Modern slavery training: resource page - GOV.UK](#)

The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how

to refer them to the NRM is available in statutory guidance [Modern slavery: how to identify and support victims - GOV.UK](#).

Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian (ICTG)¹. ICTGs provide advocacy for children and help to promote and support their recovery.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

1. Physical assault
2. Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
3. Criminal exploitation

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs and indicators which may signal that a child is at risk from, or involved with, serious violent crime. These may include:

1. Increased absence from school
2. Change in friendships or relationships with older individuals or groups
3. Significant decline in performance
4. Signs of self-harm or a significant change in wellbeing
5. Signs of assault or unexplained injuries
6. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

1. Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
2. Having been involved in offending, such as theft or robbery
3. Being male
4. Having experienced child maltreatment
5. Having used drugs or alcohol in early adolescence
6. Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

1. Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
2. Put in place a safety and support plan for the pupil (depending on the risk)
3. Where relevant, consider action to de-escalate peer conflict

Further information on indicators, risk factors, and protective actions relating to serious violence is provided in [KCSIE 2026](#).

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the [Youth Endowment Fund \(YEF\)](#) (the “what works” centre for preventing violence).

Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should therefore be satisfied that the placement meets the pupils’ needs.

The cohort of pupils in Alternative Provision often have complex needs; it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff.

The department has published voluntary [national standards for non-school alternative provision](#), alongside guidance to support schools and local authority commissioners in quality assuring providers. Local authorities may use the standards to develop a register of approved settings for use by schools. However, schools remain ultimately responsible for the provision they commission. This means schools must continue to carry out safeguarding checks and conduct their own due diligence to ensure that the provision is appropriate for meeting each child’s individual needs.

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision

placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

- [Alternative Provision](#) DFE statutory guidance, and
- [Education for children with health needs who cannot attend school](#) - GOV.UK (www.gov.uk) – DFE statutory guidance.

The department has also published voluntary [national standards for non-school alternative provision](#).

Safeguarding issues

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
- Consensual and non-consensual making or sharing of nudes or semi-nudes

(Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing nudes and semi-nudes).

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an

appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

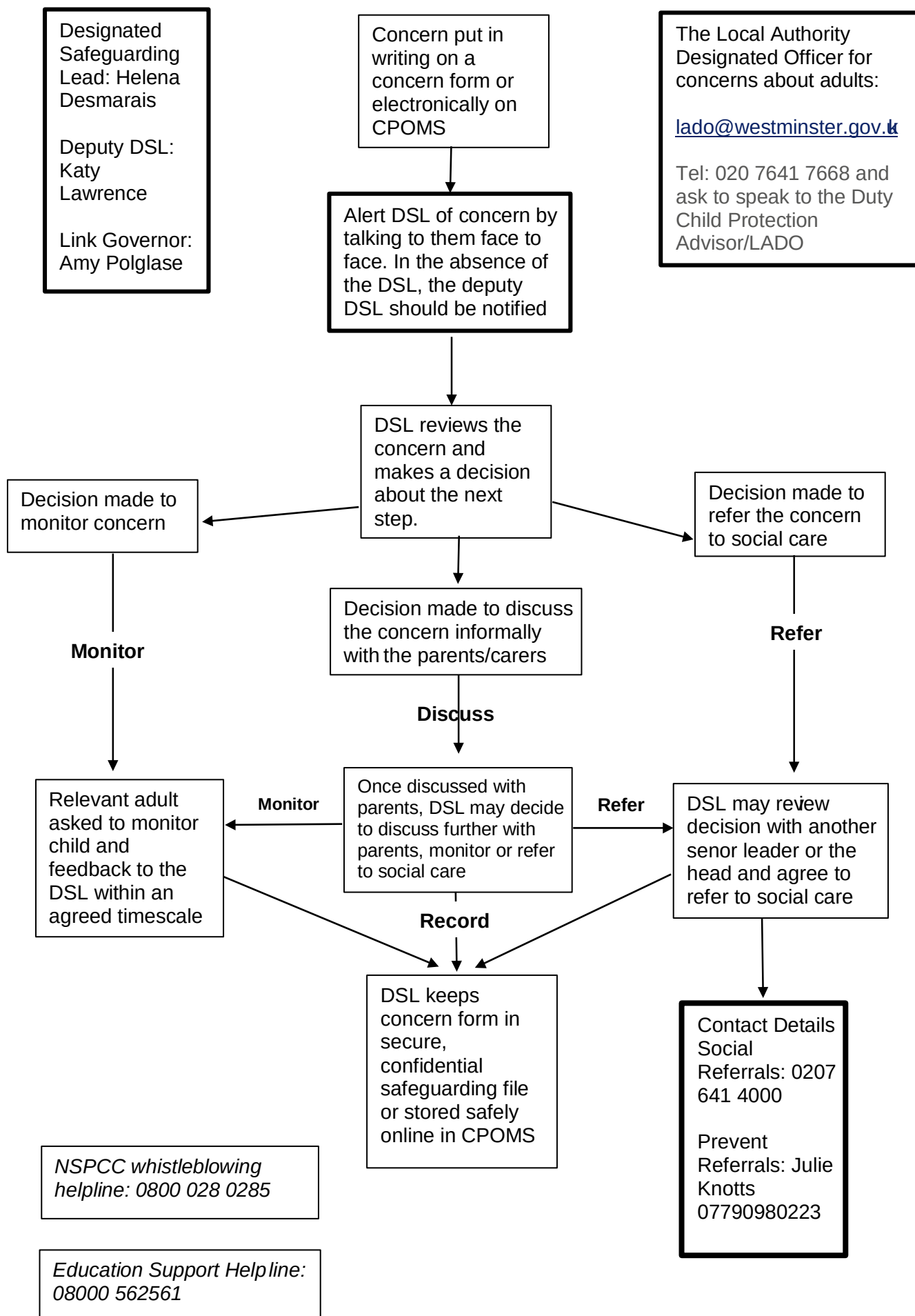
- Contact primary parents/carers
- If contact is not gained, we will contact the emergency contacts listed
- The child (children) non collected will remain in after-school club until they are collected
- We will record the incident on CPOMS

Missing pupils

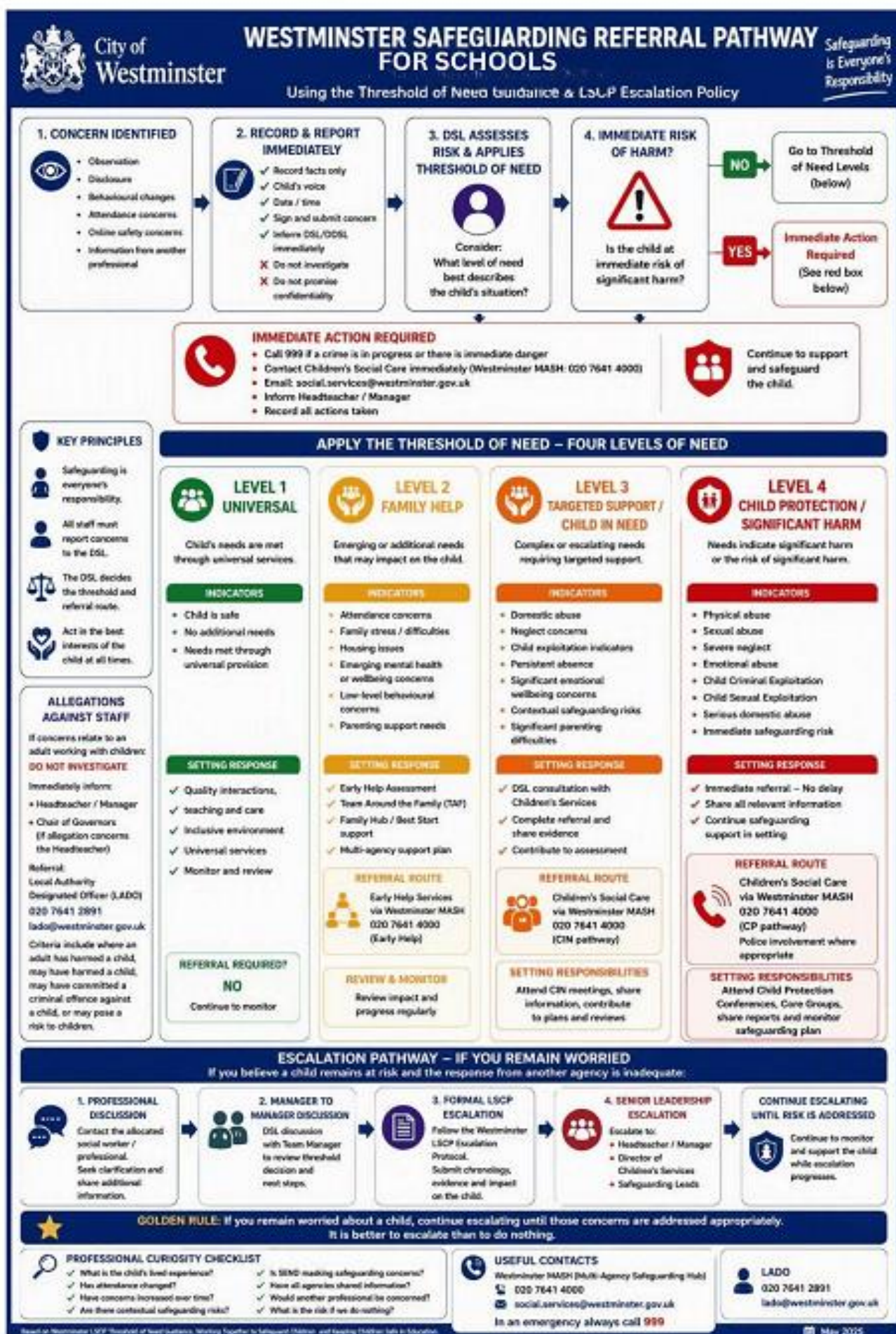
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Look for the child immediately
- Deploy additional adults to look for the child if required
- Once the child has been located, we will ensure they are placed in the correct location (i.e. classroom if during the school day, or parent/carer if at the end of the day)
- We will follow our safeguarding procedures for concerns, should the fault lie with a staff member

Appendix 5 – Flow chart for raising safeguarding concerns about a child



Appendix 5a: Westminster safeguarding referral pathway for concerns about a child



Appendix 6: allegations of abuse made against staff

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has:

1. Behaved in a way that has harmed a child, or may have harmed a child, and/or
2. Possibly committed a criminal offence against or related to a child, and/or
3. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Headteacher, or the chair of governors where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

1. Redeployment within the school so that the individual does not have direct contact with the child or children concerned
2. Providing an assistant to be present when the individual has contact with children
3. Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
4. Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

5. Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

1. **Substantiated:** there is sufficient evidence to prove the allegation
2. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
3. **False:** there is sufficient evidence to disprove the allegation
4. **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
5. **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

1. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
2. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate

5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
 1. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
 2. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
 3. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
 4. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can seek advice from their union representatives, Employee Assistance Programme (EAP) or local authority.
 5. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
 6. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
 7. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
 8. We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
 9. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers, trainee teachers, and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavor to comply with the following timescales, where reasonably practicable:

1. Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
2. If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
3. If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavor to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

1. Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
2. Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- 1) Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- 2) Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Information sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place and understood that set out clearly the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

When deciding what information to share, schools should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. This is further supported by the new information sharing duty, which is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children. Following consultation, a final draft of the statutory guidance on the Information Sharing Duty will be published shortly.

It is important that governing bodies and proprietors are aware that among other obligations, the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the data protection laws. This includes:

being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data',

- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows, where appropriate, practitioners to share special category personal data without the need for consent and
- for schools, not providing pupils' personal data in response to a Subject Access Request where the serious harm test under data protection legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the data protection laws.

Where in doubt schools should seek independent legal advice.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Further details on information sharing can be found:

- in [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing,
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#),
- the [Information Commissioner's Office \(ICO\) guide to sharing information to safeguard children and young people in the education sector in the UK](#) which is intended to help practitioners to feel confident to share personal information for safeguarding purposes, and
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours.

Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. More information on the child protection file is in Annex B of [Keeping Children Safe in Education 2026](#). It would be good practice for a conversation to

take place between the designated safeguarding leads at both settings, where there are issues or concerns.

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

1. Issues arising from the decision to suspend the member of staff
2. The duration of the suspension
3. Whether or not the suspension was justified
4. The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

1. Suspicion
2. Complaint
3. Safeguarding concern or allegation from another member of staff
4. Disclosure made by a child, parent or other adult within or outside the school
5. Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

1. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
2. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

3. Being overly friendly with children

4. Having favourites
5. Taking photographs of children on their mobile phone
6. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
7. Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

1. Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
2. Empowering staff to share any low-level concerns as per section 7.7 of this policy
3. Empowering staff to self-refer
4. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
5. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
6. Helping to identify any weakness in the school's safeguarding system

At Edward Wilson, we create an open culture, where staff are encouraged to share concerns. The Headteacher details the school's process/procedure for confidentially sharing low-level concerns further in the Code of Conduct and Staff Handbook. Additionally, see Section 17 of this policy.

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

1. Directly to the person who raised the concern, unless it has been raised anonymously
2. To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy / code of conduct]. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

See guidance from Keeping Children Safe in Education and more information in [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has

been handled by the school. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

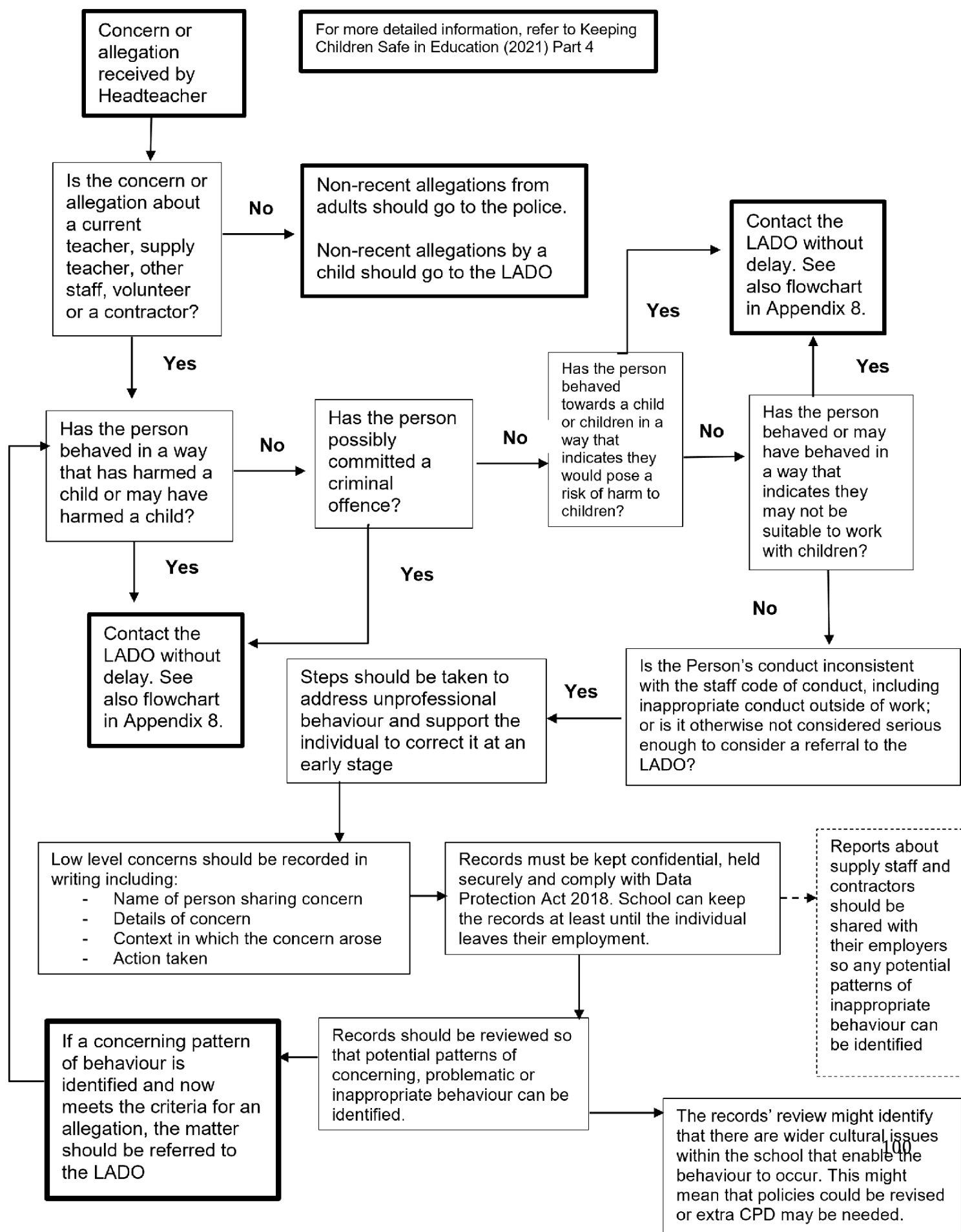
References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated safeguarding allegations that meet the harm threshold should be included in references, provided that the information is factual and does not include opinions.

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 7: Flow chart for managing low-level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



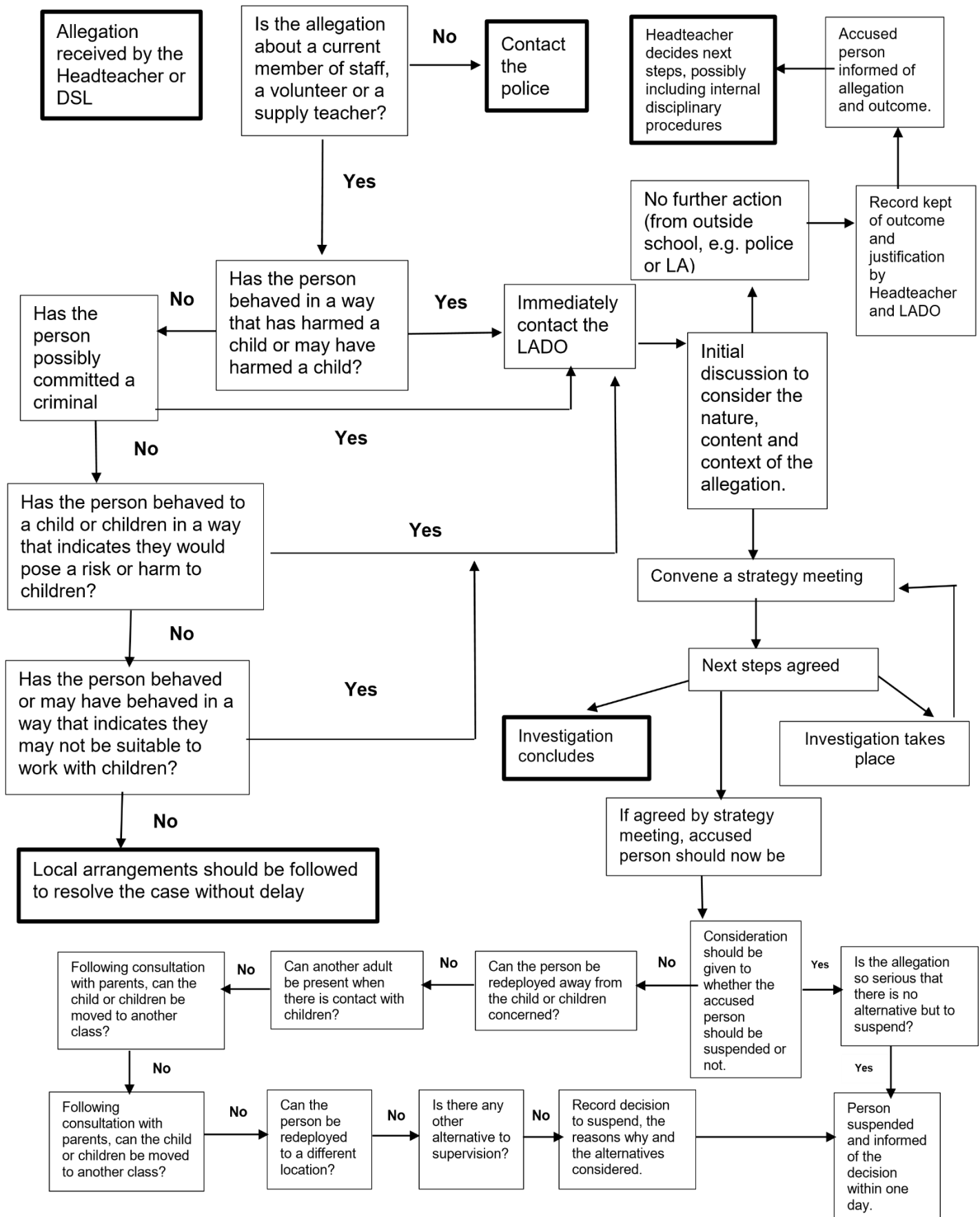
What is a low-level concern?

The term 'low level' concern does not mean that it is insignificant, it means the behaviour towards a child does not meet the threshold

(<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education>). A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Appendix 8: Flow chart for the initial management of allegations about staff or volunteers



Appendix 9: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children. [The Early Years Foundation Stage statutory framework](#) contains its own requirements for safer recruitment (see paragraph 3.13 to 3.27).

Advertising

When advertising roles, we will make clear:

1. Our school's commitment to safeguarding and promoting the welfare of children
2. That safeguarding checks will be undertaken
3. The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
4. Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

We will not accept CVs.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:

1. If they have a criminal history
2. Whether they are included on the barred list
3. Whether they are prohibited from teaching
5. Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
6. Any relevant overseas information
7. If they are known to the policy and children's local authority social care and
8. If they have been disqualified from providing childcare
9. Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

1. Not accept open references (for example, "To whom it may concern")
2. Not rely on applicants to obtain their reference
3. Not accept references from a family member
4. Liaise directly with referees and verify any information contained within references with the referees
5. Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/principal as accurate in respect to disciplinary investigations
6. Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
7. Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
8. Ensure electronic references originate from a legitimate source
9. Contact referees to clarify where information is vague or insufficient information is provided
10. Contact referees to clarify where information is vague or insufficient information is provided

11. Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
12. Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
13. Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- 1) Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- 2) Explore any potential areas of concern to determine the candidate's suitability to work with children
- 3) Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

1. Verify their identity
2. Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
3. Obtain a separate barred list check:
 - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
 - Where an individual has worked in a post in a school that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
4. Verify their mental and physical fitness to carry out their work responsibilities
5. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
6. Verify their professional qualifications, as appropriate

7. Ensure they are not subject to a prohibition order if they are employed to be a teacher
8. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a frequent basis in a school, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

Existing staff and volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. These circumstances are when:

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

- This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Obtain references for volunteers before they are recruited
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Retention of documents

Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file as per the advice of [Keeping Children Safe in Education \(2026\)](#)

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. To help schools comply with the requirements of

the data protection laws, if Edward Wilson School chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed Edward Wilson may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to.

Schools do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record. Further information on handling DBS information can be found on GOV.UK.

Agency and third-party staff (supply staff)

Schools must obtain written notification from any agency, or third party organisation, that they have carried out the same checks as the school would otherwise perform on any individual who will be working at the school (or who will be providing education on the school's behalf, including through online delivery). In respect of the enhanced DBS check, schools must ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school, which has disclosed any matter or information, or any information was provided to the employment business, the school must obtain a copy of the certificate from the agency.

Where the position requires a children's barred list check, this must be obtained by the agency or third party by obtaining an enhanced DBS certificate with children's barred list information, prior to appointing the individual.

The school should also check that the person presenting themselves for work is the same person on whom the checks have been made.

Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 – 'data protection laws'

Throughout this guidance, the term 'data protection laws' refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

It is important that governing bodies and proprietors are aware that among other obligations, the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.

In addition, see the DfE Data Protection guidance for schools, which will help school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

Appendix 10: Additional information and support

Departmental advice [What to Do if You Are Worried a Child is Being Abused](#) - Advice for Practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school staff.

The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

Advice - [Best Start in Life](#) and [Family Hub](#). See also **Figure 1** for the overview of support and **Figure 2** – services offered by the Family Hub.

Figure 1 – Best Start in Life Family Hub overview



Figure 2 – Family Hub services offered

