

# Safeguarding and Child Protection Policy (includes Prevent Duty) September 2025

Policy reviewed	August 2025	
Date approved by Governing Body		
Next review date	August 2026	

## Key Personnel

Role	Name	Contact details
Headteacher*	Mr Adam Walker	Adam.walker@oldburywells.com
Designated Safeguarding Lead (DSL)*/**	Mrs Rebecca Lawson	Becky.lawson@oldburywells.com
Deputy DSL(s)*/**	Mr Tom Williams Mrs April Bishell	<a href="mailto:Tom.williams@oldburywells.com">Tom.williams@oldburywells.com</a> <a href="mailto:April.bishell@oldburywells.com">April.bishell@oldburywells.com</a>
Designated Teacher	Ms Sarah Barlow	Sarah.barlow@oldburywells.com
Mental Health Lead	Mrs Rebecca Lawson	Becky.lawson@oldburywells.com
Online Safety Co-Ordinator/Lead	Mrs Nicole Nicholson	Nicole.nicholson@oldburywells.com
Relationship Sex Health Education Lead	Mrs April Bishell	April.bishell@oldburywells.com
Chair of Governors*	Mr Alan Edwards	<a href="mailto:Alan.Edwards3@oldburywells.com">Alan.Edwards3@oldburywells.com</a>
Safeguarding Governor/Trustee	Mr Connor Ronbinson	connor.robinson@oldburywells.com

## Policy Scope and Aims

This policy applies to anyone working on behalf of Oldbury Wells School including senior managers and the board of trustees/governing body, staff, volunteers, contractors, agency staff and students.

The policy is publicly available on the school website so that it can be accessible for our children; their families and anyone visiting and /or working with us.

The policy aims to meet the requirements as outlined in Part 2 [Keeping children safe in education](#)

## Safeguarding Statement

We believe that:

- All children have the right to protection from all types of abuse, neglect, exploitation and/or harm.
- Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

This means that we will:

- Not tolerate the abuse, neglect or exploitation of children. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse, neglect, exploitation and/or harm. This applies to anyone who is part of, comes into or works with our school.
- Be child centred <sup>1</sup>and ensure that we consider the best interests of children in everything that we do. This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.
- Ensure we provide a safe environment for children to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect, exploitation and/or harm of a child.
- Ensure no child or group of children are treated less favourably by us than others.
- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who we know are more vulnerable to experiencing abuse, neglect, exploitation, harm or discrimination.
- Work in partnership with our children, their parents, carers, and other agencies.

## Key Terms

**Safeguarding** and promoting the welfare of children is defined in Working Together to Safeguard Children 2023 as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether this is within or outside of 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;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes<sup>2</sup>:

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<sup>1</sup> See [Working Together to Safeguard Children](#): Chapter 1: A child centred approach

<sup>2</sup> [Children's social care: national framework - GOV.UK \(www.gov.uk\)](#)

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**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, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experiences 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 another child or children.

There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in Part 1, Part 5 and Annex B of [Keeping children safe in education](#)

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent in either a paid or voluntary capacity. The exception to this term is Governors/Trustees.

**Governors/Trustees** refers to those who are part of the School’s Governing Body. This includes individuals who are at Trust or Charity governing body level as well as part of local school governance bodies.

**Child** includes everyone under the age of 18.

A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children’s Act 1989) or has care of a child.<sup>3</sup>

## Legislation, Standards and Guidance

This policy is based on the following legislation, guidance, standards, and procedures:

Legislation	Statutory National Guidance/Standards	Local Procedures
<ul style="list-style-type: none"> <li>• <a href="#">Education Act 2002 Section 175 (maintained schools only)</a></li> <li>• <a href="#">Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)</a></li> <li>• <a href="#">Children Act 2004</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Keeping Children Safe in Education</a> and any legislation or guidance (statutory/non-statutory)outlined or referenced within it.</li> <li>• <a href="#">Working Together to Safeguard Children</a> and any legislation or guidance (statutory or non-statutory) outlined or referenced within it.</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Shropshire Safeguarding Community Partnership West Midlands Safeguarding Children Procedures</a></li> <li>• <a href="#">Shropshire Safeguarding Community Partnership Threshold Guidance</a></li> <li>• <a href="#">Shropshire Safeguarding Community Partnership. Allegations about staff/volunteers</a></li> </ul>

<sup>3</sup> S576 Education Act 1996

## Linked Policies

This policy and procedure will also link to other school policies:

- Behaviour for Learning Policy
- Staff Code of Conduct
- Anti-Bullying Policy
- Safer Recruitment Policy
- Special Educational Needs and Disabilities (SEND) Policy
- Mental Health Policy
- Attendance Policy
- Sexual Harassment Policy
- Health and Safety Policy
- Relationship and Sex Education Policy
- E-safety/ICT Policy

## Roles and Responsibilities

We follow the statutory guidance as set out in the latest [Keeping children safe in education](#) (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

### **The Governing Body/Proprietors/Management Committee:**

Have a strategic leadership responsibility for ensuring we take a whole school approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under [Legislation and Guidance](#). Part 2 Keeping Children Safe in Education outlines their key responsibilities.

The Safeguarding Governor/Trustee is responsible for leading on the governance oversight of safeguarding arrangements; regularly meeting with the Designated Safeguarding Lead termly and reporting back to the Governing Body Proprietors/Management Committee through governor meetings.

The Chair of the Governing Body/Proprietors/Management Committee will liaise with the Local Authority in the event of an allegation of abuse made against the Headteacher in line with [Ensuring safe staff](#) .

All Governors/Trustees will ensure:

- The school has a Designated Safeguarding Lead who has the appropriate status and authority to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- The school has safeguarding policies and procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with our duties under [Legislation, Standards and Guidance](#) at all times.
- All staff and governors are knowledgeable and confident in carrying out their safeguarding duties in line with [Professional development and support](#).
- That the effectiveness and implementation of safeguarding arrangements are robustly overseen by the Governing Body/Proprietor/Management Committee through monitoring meetings.

### **The Headteacher:**

Is responsible (with the lead support of the Designated Safeguarding Lead) for ensuring safeguarding arrangements are implemented effectively in school.

This includes:

- Having the overarching responsibility of ensuring the effectiveness of our school safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the Governing Body (with the support of the Designated Safeguarding Lead) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#). This includes ensuring that the Senior Leadership Team work effectively together and with the Designated Safeguarding Lead, to ensure a whole school approach to safeguarding.
- Take the lead role in [Ensuring Safe Practice](#); including ensuring staff are knowledgeable and confident in their safeguarding practice; including making sure that their practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liasing with the Local Authority Designated Officer (with the support of the Designated Safeguarding Lead) or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the Designated Safeguarding Lead and any deputy(ies) to carry out their roles effectively. This means ensuring they are given sufficient time, training, support, resources, including cover arrangements where necessary.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.
- Ensuring that school policies relating to site safety and health and safety guidance and relevant legislation are in place, implemented and followed by all staff. All settings please ensure relevant policies address Local requirement to notify local authority of any notifiable incidents as outlined in [Education Update - 17th June 2025](#)). Setting should also be taking steps to prepare for the statutory requirement (as outlined in Terrorism (Protection of Premises) Act 2025: aka “Martyn’s Law) to mitigate the impact of a terrorist attack and reduce harm in the event of an attack occurring.(please see [Education Update - 24th June 2025](#))

### **The Designated Safeguarding Lead (DSL):**

Takes the lead responsibility for safeguarding and child protection in our school. Annex C [Keeping children safe in education](#) outlines their key responsibilities. Our Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSL) support the Designated Safeguarding Lead in the discharge of their responsibilities.

Responsibilities include:

- Ensuring that the school has a child protection policy is in place as required by [Keeping children safe in education](#), that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours. Out of hours, school can be contacted by emailing [admin@oldburywells.com](mailto:admin@oldburywells.com)
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to our school.
- Supporting the Headteacher to [Ensure Safe Practice](#) in school.
- Managing safeguarding referrals to the Local Authority; Police, and any other statutory authorities or multi-agency risk management arrangements (see [Designated Safeguarding Lead Response](#)).
- Working closely with the Governing Body, Headteacher and relevant senior leadership team members to ensure a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#) and the implementation of effective safeguarding arrangements, as outlined in this policy.
- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership arrangements as outlined in [Working in Partnership](#).
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in [Working in Partnership](#).
- Act as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in school.

- Ensuring the effective management and oversight of safeguarding information as outlined in [Record Keeping and Information Security](#).
- Maintaining and access [Professional development and support](#).

**All staff (including students and volunteers):**

Are expected to work in line with our [Safeguarding Statement](#) and adhere to the policies, processes and systems that support safeguarding as outlined in this policy. This specifically includes:

- Accessing and maintaining [Professional development and support](#) to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, Respond and Report [Staff Safeguarding Concerns](#)
- Engaging in [Safe Practice](#). This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of children as outlined in [Ensuring safe staff](#).
- [Teaching our children how to keep safe](#)

**Professional development and support**

- To ensure all our staff and governors are knowledgeable and confident in keeping children safe in our school; they will complete the professional development activities as outlined below in the area of safeguarding and child protection. We monitor professional development activities and maintain a central professional development record.
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. There are regular updates and small training sessions delivered in our CPD sessions of Teach Meet. The Designated Safeguarding Lead (and deputy(ies)) receive regular support and supervision from the school management processes

**All Staff (including volunteers)**

Activity	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in KCSiE 2025 (Part 1)	Induction or when arrangements/procedures are updated.
Read <a href="#">Keeping children safe in education 2025</a> (KCSiE): <ul style="list-style-type: none"> <li>• <b>All Staff:</b> Part 1; Part 5 and Annex B.</li> <li>• <b>Senior Leadership Team:</b> Entire document</li> <li>• <b>Staff who do not work directly with children:</b> Annex A</li> </ul>	Induction then annually (in Autumn Term) or when updated.
Complete Safeguarding Awareness Training to enable staff to <a href="#">recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns</a>	Induction and then every 2 years
Teaching: Complete FGM training appropriate to role (see <i>Local Authority Safeguarding in Education Training Statement at: <a href="#">Early Years and Schools Training and Consultancies   Shropshire Learning Gateway</a></i> )	Induction and then every 2 years
Complete Prevent Awareness Training appropriate to role	Induction and annually
Complete Cyber Security Training	Induction and then annually

Receive regular national and local safeguarding updates (including those relating to online safety).	As required and at least annually. Staff to receive regular safeguarding information and training in staff spotlight briefings
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### Designated Safeguarding Leads (including any deputies)

Activity (in addition to all staff above)	Frequency
Complete Schools Designated Safeguarding Lead Training to a standard as outlined in KCSiE Annex C	On induction in role and then every 2 years
Read <a href="#">Keeping children safe in education 2025</a> in its entirety.	Induction into role then annually (in Autumn Term) or when updated.
Complete Prevent Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> and DSL specific packages (including EYFS and Independents) at <a href="#">Regional Prevent education co-ordinators - GOV.UK</a> )	On induction and then every 2 years
Maintain knowledge and development relating to the role of DSL	As required, but at least annually

### All Governors

Activity	Frequency
Complete Governor Safeguarding Training to equip them with the knowledge to carry out their strategic <a href="#">Roles and Responsibilities</a> .	Induction and then every 2 years.
Read <a href="#">Keeping children safe in education 2025</a> <ul style="list-style-type: none"> <li><b>All Governors:</b> Part 1; Part 2 and Annex B.</li> <li><b>Chair &amp; Safeguarding Link Governors:</b> Entire document</li> </ul>	Induction into role then annually (in Autumn Term) or when updated).
Complete Cyber Security Training	Induction and then annually
Complete Prevent Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> and Governor specific packages (including EYFS and Independents) at <a href="#">Regional Prevent education co-ordinators - GOV.UK</a> )	Induction and every 2 years.

### Staff/Governors involved in recruitment of staff (including administration)

Activity (in addition to other relevant above)	Frequency
Read Part 3: <a href="#">Keeping children safe in education 2025</a>	Induction into role then annually (in Autumn Term) or when updated.
Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE)	Induction and every 3 years (or when KCSiE Part 3 is updated)

# Ensuring Safe Practice

## Safer recruitment

We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in our setting. We ensure at least one member of a selection panel is safer recruitment trained; as outlined in [Professional development and support](#). Our recruitment procedures are in alignment with Keeping Children Safe in Education 2025: Part 3.

As part of our recruitment and selection processes; we ensure that our commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. These procedures are included in the application information for candidates. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks prior to interview and make shortlisted candidates aware of these checks; as well as ensure that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

In accordance with Keeping Children Safe in Education 2025: Part 3; we maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students); Governors/Trustees; [contractors](#); and [visitors](#) who attend our school in a professional capacity. We complete the checks on staff, volunteers, and Governors/Trustees who we recruit ourselves. For those who are recruited by others; we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with children.

Where we do not have all the necessary information or there are gaps in the information; we have robust risk assessment processes in place. For anyone who does not meet the required standards of pre-appointment checks or suitability, the risk assessment will determine if they are allowed to work unsupervised or engage in regulated activity with children. We reserve the right to refuse access to the school site to any person who we are not assured is safe to work or engage in regulated activity with children.

On appointment; staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of school.

If any safeguarding concerns of allegations arise relating to a member of staff, Governor/Trustee or other person working on our school premises; staff are expected to act in line with [Ensuring safe staff](#) and [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

## Contractors

We have several contracts with external providers to work in our school including with children. Contractors who have a contract with the school for example, Catering and Cleaning providers receive Safeguarding training from the school, as part of the whole-school Safeguarding and KCSIE training. Companies who visit school to carry out authorised contracted work including building contractors, undergo Enhanced DBS checks. All contractors on site, who work unsupervised or work directly with children have Enhanced DBS informed recorded on the school Single Central Register (SCR). Any contractor on site without an Enhanced DBS, is accompanied at all times by a member of staff.

## Visitors

For all school visitors, procedures are in place for checking and recording details and confirming the identity of visitors, including prospective candidates. All visitors are required to sign in and out of school at the school reception; and we ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to children.

Any school visitor who has an Enhanced DBS, is recorded on the school's Single Central Record (SCR) and authorised to attend site unaccompanied. Visitors without Enhanced DBS recorded on the SCR are

accompanied at all times by a member of staff. All visitors are required to wear visitor lanyards; those who are authorised to attend site unaccompanied, are provided with 'green' visitor's lanyards and those who must be accompanied, are provided with 'red' visitor lanyards. This enables staff and students to clearly identify which visitors can be unaccompanied and those that must be accompanied.

### **Work experience (*Secondary Schools/Colleges only*)**

We have processes in place to ensure that individuals or companies who provide work experience placements for our children have appropriate safeguarding policies and procedures in place. We ensure that any adults who are supervising children on work experience have the appropriate checks carried out as required by [Keeping children safe in education](#): Part 4: Adults who supervise children on work experience”.

If a child's work experience placement is in a “specified place” where regulated activity is carried out (such as an education or childcare setting); we will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out. The safeguarding policy is shared with a named contact in the work experience placement and a dedicated contact in school for pupils, parents/carers and placement provider.

### **Use of school premises for non-school activities**

When we have arranged extra-curricular activities out of school hours which are under the direct supervision or management of school staff, this safeguarding policy is to be followed and any concerns should be managed in accordance with [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#).

We will follow our [Ensuring safe staff](#) procedures if we become aware of any allegations relating to an organisation or individual using our school premises.

Where we have sessions or activities which are provided by another person or organisation that is using the school site and not during school time or under direct supervision, we seek assurances that they have the required child safeguarding arrangements in place as an individual/organisation as outlined in [Keeping children safe during community activities](#) and [Visitors](#). This is regardless of whether children who are on roll at our school access the activity or not.

The arrangements for this will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

### **Ensuring Safe Staff**

#### Managing allegations (including low level concerns)

We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf the school are dealt with appropriately.

There are two levels of allegations / concerns:

#### **1. Allegations that may meet the harm threshold.**

Circumstances where a someone working within the school has or may have:

- behaved in a way that have harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.

Allegations that someone that working in, at or on behalf the school has met the harm threshold should be immediately referred to the Headteacher in person. Staff may be required to provide a written statement at the request of the Headteacher.

If the allegation relates to the Headteacher; this should be immediately verbally reported to the Chair of Governors/Proprietors/Management Committee.

If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure [Immediate safety](#) and contact the Local Authority Designated Officer in accordance with [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#).

In most cases; the Headteacher (or the Chair of Governors/Proprietors/Management Committee if applicable) will lead on managing allegations; with the support of the Human Resources Department and the Designated Safeguarding Lead They will ensure that Part 4 [Keeping children safe in education](#) and [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#) are applied. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within 1 working day and we will follow their advice and guidance.

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fairly and consistent way to effectively safeguard all those involved.

We also have a duty of care towards our staff, and we will provide a named contact for the staff member.

If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 [Keeping children safe in education](#) if the criteria for such reporting is met.

## **2. Allegations / concerns that do not meet the harms threshold (Low level concerns).**

The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Our staff code of conduct outlines examples of what could be considered a low-level concern;
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the Headteacher to embed our culture of openness and transparency. To ensure that our school's values and expected behaviours are lived, monitored, and reinforced by all staff.

The Headteacher will decide the outcome of all low-level concerns (in consultation with the Designated Safeguarding Lead if necessary) raised in line with Staff Code of Conduct. Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

### Whistle Blowing

Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children.

If staff have such concerns; these should be raised to the Headteacher

If staff feel unable to raise concerns with the school directly; they can contact

- [NSPCC Whistleblowing Advice Line](#). NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends.
- The email address is: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a childcare and education providers: [Complaints procedure - Ofsted - GOV.UK](#)
- General guidance on whistleblowing can be found via: [Whistleblowing for employees: What is a whistleblower - GOV.UK](#)

## Record Keeping and Information Security

We have a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We have data protection processes in place to ensure that we keep and process (manage) personal information about children, their families, staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with [Meeting digital and technology standards in schools and colleges](#) see also [Online Safety](#))
- Manage requests for access to personal information we hold (known as subject access requests).

Details of our processes and how to request access to personal information we hold are outlined in our policy and procedure including the form to submit (Appendix 2), within our GDPR and Data Protection Policy on our website. <https://www.oldburywells.com/media/66747/gdpr-and-security-breach-procedure-nov-24-hybrid.pdf>

## Storage and management of safeguarding information (child protection files)

Safeguarding [concerns](#) and [responses](#) for individual children are kept in a child protection file. Child Protection files are stored individually for each child and are separate to a child's main pupil file. The Designated Safeguarding Lead is responsible for ensuring the quality, maintenance, and management of child protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding. Secure records of incidents and actions are kept on CPOMS, with only the DSL and Safeguarding and Welfare officer having complete access to these. All paper records will be stored in a separate confidential file in a locked, secure place with restricted access.

## Sharing safeguarding information with others

We are proactive in sharing information with each other and others who are working with our children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect, exploitation and/or harm.

Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to know basis in line with our [Safeguarding Statement](#) so that we keep children safe and promote their welfare. They are not permitted to share information with friends, family, or anyone in the local community outside of their work.

### Sharing information with other organisations

Staff should be familiar with and use [Information sharing advice for safeguarding practitioners](#).

As part of our [work in partnership](#) with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so.

This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore, staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to do so.

Decisions to share safeguarding information with other organisations will be overseen by the Designated Safeguarding Lead (please also refer to [Designated Safeguarding Lead Response](#)). The Designated Safeguarding Lead will keep detailed, accurate, secure written records of all concerns, discussions and

decisions made including rationale for those decisions. This should include instances where referrals have or have not been made to another agency.

#### Transfer of child protection files and other safeguarding information

When a child leaves for a new education setting; the Designated Safeguarding Lead will arrange for the child protection file (and any additional information to help the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term. Where the move is planned; the Designated Safeguarding Lead will consider sharing information in advance of the child leaving to help with the child's transition and to enable any help and support they may need. We will use the Shropshire Transition in Education Guidance (safeguarding children at educational transition points) | Shropshire Learning Gateway to guide our practice approach. This is shared separately to any child's main file and confirmation of receipt of the files should be gained [Appendix C: File Transfer Record and Receipt](#)

If a child is absent from education or Electively Home Educated; we share relevant information with the Local Authority as required by law (please also see [Children potentially at greater risk of harm](#)). If the child leaves our setting and does not move to a new education setting; we transfer their child protection file (and any additional information as necessary) to the relevant Local Authority that they reside in line with the local protocol.

## Working in Partnership

As is outlined in our safeguarding statement; and in order to ensure all children in our school are effectively safeguarded and their welfare is promoted; we will work in partnership with our children, their parents and other agencies/partnerships as follows:

### Children

Our children are taught how to keep safe; including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing or that of others. We encourage children to share and report worries and concerns by:

- Reporting through online
- Speaking to a trusted member of staff
- Speaking to the pastoral team
- Reporting directly to the DSL

Staff are expected to build trusted relationships with and work in the best interests of children in line with our Safeguarding Statement; and recognise, respond and report staff safeguarding concerns.

We also actively seek children's views of safety in school through anonymous on-line surveys.

### Parents

We recognise the importance of working together with and supporting parents to safeguard and promote the welfare of their children. This includes:

- Communicating to parents how we keep children safe in our school (including online). This policy is made available to all prior to their child joining Oldbury Wells School, as well as details of the complaints procedure. In general, any concerns will be discussed with parents and we will offer support.
- If parents want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent views of safety in school through on-line feedback.
- Encouraging parents to share and report worries and concerns about the safety and welfare of their child(ren) or any other children.

- Staff are expected to respond to any parents who raises worries or concerns to them either about their child(ren) or others in line with [Staff Safeguarding Concerns: Recognise, Respond, Report](#).
- The Designated Safeguarding Lead will ensure that we work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare in line with the local arrangements in the area that they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies.
- Providing parents with regular information, guidance and external support available to them via the school website.

### Other agencies/partnerships

As we operate in Shropshire; we engage and co-operate with our local safeguarding arrangements. Our local safeguarding partnership is the [Shropshire Safeguarding Community Partnership \(SSCP\)](#). We engage and co-operate by:

- Ensuring we effectively safeguard and promote the welfare of children living in Shropshire in line with [Working together to safeguard children](#) and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the [SSCP Threshold Document](#). Where children do not live in Shropshire but attend our school; we will work in line with the relevant local arrangements in their home area.
- Ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding [Children potentially at greater risk of harm](#).
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to children in Shropshire.
- Participating in the local [Operation Encompass arrangements](#); an arrangement where police notify schools when a child who attends their school may have been subject or witness to police-attended incidents of domestic abuse. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse.

### Teaching our children how to keep safe.

We recognise that educating our children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards the provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- Behaviour/Anti-Bullying Policy
- Preventing radicalisation
- Our approach to on-line safety
- Our Personal Social Health and Education and Computing curriculum and policies including our RHE /RSHE Policy. Our RSHE programme is compliant with [Relationships and sex education \(RSE\) and health education - GOV.UK](#). It is developed to be fully inclusive of all ages and stages of development and consideration of children's needs including [Children potentially at greater risk of harm](#); and addresses issues as outlined in [Keeping children safe in education](#) Part 2: Opportunities to teach safeguarding.
- The DSL, RHE/RSHE lead and other key members of the Senior Leadership Team (such as computing, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in school.

## Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of and life in school. We also recognise the important role ICT plays in the lives of our children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; as outlined in the following categories:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; for example: 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; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We adopt a whole school approach to online safety which aims to safeguard and educate our children and their families, staff, visitors and our school in our use and management of ICT (including the use of camera enabled; mobile and personal devices and the ICT systems we have in place). Our online safety policy outlines our approach.

Where there are online safety concerns involving identified children (including child-on-child abuse); we will follow Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Safeguarding Response. Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with our Data Protection Processes to the Information Commissioners Office. Please also see Record Keeping and Information Security.

Where children are being asked to learn online at home, we follow advice from the Department of Education; Safeguarding and remote education. Our approach to remote learning is outlined in our Remote Education Policy.

We review our online safety arrangements annually to ensure that we meet the Keeping Children Safe in Education 2025 and online safety standards (including the digital standards for filtering and monitoring and cyber security as well as following guidance on safe use of generative AI in education: module 3 - GOV.UK). Any risks arising from our reviews are clearly recorded as part of our school evaluation and improvement action planning processes. These are reported to and overseen by our Governing Body. All Staff, senior leaders and Governors are appropriately trained (see Professional Development and Supervision) to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

## Preventing Radicalisation

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being radicalised into terrorism.

We fulfil our duty by:

- Promoting fundamental British Values as part of our values and curriculum (refer to relevant policies).
- Ensure that we provide a “safe space” for children to understand and discuss sensitive topics, those linked to radicalisation and terrorism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
- Be alert to and identify children who may be susceptible to radicalisation into terrorism and where it is assessed as appropriate by the Designated Safeguarding Lead; make a Prevent referral (in line with the local Preventing Terrorism Processes)
- Monitor and report any hate based behaviour as part of our Behaviour and Child-on-Child Abuse Policies (Hate related incident reporting processes can be found here).
- Outline in our Online Safety and Relationship Sex Health Education Policies (include any other curriculum subjects related policies) how children are being safeguarded from being drawn into terrorism. (please also refer to Teaching our children how to keep safe)
- Ensure that hosting external speakers or visitors that attend our school premises are suitable and appropriately supervised (please also refer to Visitors)
- Assess the risk of our children being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in our school evaluation processes; and inform our approach to online safety (including filtering and monitoring and cyber security arrangements).

We regularly review our adherence to the Prevent Duty. Any actions arising from our assessment are included in our school evaluation and improvement action planning processes. These are reported to and overseen by our Governing Body.

All Staff, senior leaders and Governors are appropriately trained (see [Professional Development and Supervision](#)) to enable them to ensure that all children, particularly those who may be susceptible to radicalisation are effectively safeguarded. We respond to children who are identified as being susceptible to radicalisation in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#) sections of this policy.

## Children potentially at greater risk of harm

We recognise that whilst all children should be protected, some groups of children, are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

### Children who need a social worker (Child in Need and Child Protection Plans).

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and /or complex family circumstances. A child’s experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. We work with other agencies, including statutory safeguarding partners, to support vulnerable children. This often involves working in partnership with social care and workers. We hold regular meetings in school, take part in partnership forums and access multi-agency training. In addition, we facilitate meetings for individual children and families in school to support easier local access and involvement.

### Looked After Children and previously looked after children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family’s life. We ensure that appropriate staff members have access to the information they need in relation to a child’s looked after legal status, contact and care arrangements. School has a designated teacher who works with the LA to promote the educational achievement of registered students who are looked after in line with statutory guidance.

### Children who attend Alternative Provision

Children placed in Alternative Provision (AP) often have complex needs and may be more vulnerable to harm. When a school commissions AP, it retains responsibility for the child's safety and welfare and must ensure the provider can meet the child's needs.

Our school supports this by ensuring safeguarding arrangements at any Alternative Provision that we commission are effective and compliant with Keeping children safe in education (Part 2) and Alternative Provision Department for Education.

### **Children who are absent from or are not in receipt of full-time education**

All children aged 5-16 are legally entitled to a full-time education, suitable to any special education need. Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms, including exploitation.

Children being absent from education provision for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect (including [Educational Neglect](#)) or child exploitation; as well as other needs. Our response to persistently absent pupils and children who are absent from 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. The school has procedures in place for unauthorised absence and for dealing with children that go missing, particularly on repeat occasions. These involve contacting parents/ carers and undertaking home visits. There are also processes in place to help identify students at risk of abuse, neglect and exploitation to help reduce the risk of them going missing. Our Attendance Officer liaise with parents/carers and provides them with information if there are concerns relating to their child being absent from education. We have policies in place; that are in line with associated statutory guidance and [Shropshire Council Education Access Service Local Processes](#) including:

- Attendance Policy (*this is in line with [Working together to improve school attendance and Children Missing Education](#) process when removing a child from the school roll at standard and non-standard transition points*). See [Education Access Service SLG](#) for further information.
- Children with health needs who cannot attend school (*ensure this is in line with [Education for children with health needs who cannot attend school](#)*)

### **Children who are Electively Home Educated**

Many home educated children have an overwhelmingly 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, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. When a parent notifies us that they wish to deregister their child to electively home educated them, we will immediately notify the local authority.

When a parent/carers has expressed an interest of their intention to remove their child from school, with a view to home education, we operate in line with DfE guidance and Shropshire Council EHE process and protocols. We work with the LA to try and coordinate a meeting with parents/carers to ensure that they have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or disability, and/or has a social worker and/or otherwise vulnerable.

### **Children who have experienced multiple suspensions and are at risk or, or have been permanently excluded**

It is important that children in our school know and understand how we expect them to behave and we ensure that our school is a safe place where all children feel safe and are able to learn. Serious, harmful and/or repeated behaviour by children will always be responded to. Such behaviour can be a sign or

indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation or some other form of adverse experience<sup>4</sup> in their life.

Our Behaviour Policy outlines the expected standards of behaviour for our children; as well as how the school will support and respond to children with additional needs (including Special Educational Needs and Disabilities), or whose needs or circumstances might affect their behaviour. Where a child's behaviour also indicates a safeguarding concern; staff will adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

### **Children requiring Mental Health Support**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised. If there are concerns that a child's mental health needs may place them at risk of harm (for example concerns about suicidal ideation or attempts, self-harm, eating disorders etc); then staff will adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

We have a senior mental health lead who is a member of the senior leadership team. The school has systems and processes in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems [Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK \(www.gov.uk\)](#)

### **Children with Special Education Needs Disabilities or other health issues**

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. We recognise that additional barriers can exist when recognising abuse and neglect in this group of children (e.g., assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration. Our schools provides extra pastoral support and attention for these children in line with [SEND code of practice](#), [The SEND local offer | Shropshire Council](#) and [Education for children with health needs who cannot attend school](#) -.

### **Children who are lesbian, gay, bisexual or gender questioning**

The fact that a child or a young person may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm. However, children in these groups can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning can be just as vulnerable as children who are. We reduce the additional barriers faced for children in this group by following the guidance in [Equality Act 2010: advice for schools](#).

## **Child-on-Child Abuse**

As set out in our [Safeguarding Statement](#); we will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse.

We want to ensure that no child-on-child abuse takes place in our school. However, we understand that we cannot just rely on children telling us that they are experiencing abuse from other children. Staff should understand that even if there are no reports in school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their [Professional Development and Supervision](#); which do not just rely upon children telling someone. Staff are expected to follow our [Appendix B: Child-on-Child Abuse Procedures](#)

The school monitors patterns of child-on-child incidents including those involving abuse, to ensure that we are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by our Governing Body.

## Staff Safeguarding Concerns: Recognise, Respond, Report

### Recognise

#### Be alert and curious!

Pay attention to possible **signs or indicators** of abuse/harm to the child from the child themselves or others either from your own observation or what the child/others tell you:

Appearance

Behaviour

Communication.

**Do not just rely on a child telling you** (there are lots of reasons why they won't)

Any child in any family could become a victim of [abuse](#), neglect, exploitation and/or harm. Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse.

Staff should always maintain the attitude that abuse “could happen here”. Staff should be particularly alert to [Children potentially at greater risk of harm](#) and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse/harm.

As well as maintaining their [Professional development and accessing support](#); staff can remind themselves of the signs and indicators of abuse/harm and safeguarding issues by referring to: [Keeping Children Safe in Education](#) : Part 1 and Annex B. and [SSCP - Contacts and Definitions](#).

**Signs and indicators** of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their:

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

**Concerns shared directly by a child:** Staff *must not rely* on children telling them they are experiencing abuse, neglect, [exploitation](#) and/or harm. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with our [Safeguarding Statement](#); [work in partnership](#) and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.

**Observations:** In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school).

**Concerns shared by others:** either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.

**Other systems we have in place:** For example online through filtering and monitoring arrangements, or information from other agencies through [working in partnership](#) etc.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse/harm. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances; staff are still expected to respond in line with this policy.

## Respond

Ensure the immediate safety of the child potentially at risk. If there is **immediate danger**; take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and [refer child protection concerns](#))

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or [Appendix B: Child-on-Child Abuse Procedures](#) as applicable).

Seek views/gather relevant information (if safe to do so).

**Remember:** Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

### Immediate safety

If a child is in **immediate danger**; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow [Multi-agency Referral: Reporting concerns \(MARF\)](#) )
- Work in line with our Behaviour Policy and [Use of reasonable force in schools](#) guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the [Ensuring safe staff](#).

### Other relevant policies/processes

Staff may need to follow other school safeguarding policies/processes (see [Linked Policies](#)) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse; [Appendix B: Child-on-Child Abuse Procedures](#) should be referred to.

### Injuries

We request parents notify us of any accidents or injuries to their child before attending school. We will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow our accident reporting and first aid procedures.

### Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children);
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see [Record Keeping and Information Security](#))
- Their parents (if necessary and depending on the circumstances and their role).

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to [When concerns are directly shared by a child](#).

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations so that help and support can be provided to them. If consent is not given; staff should follow guidance in the [Recording Keeping and Information Security: Sharing safeguarding information with others](#) section.

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead. Decisions to share safeguarding concerns with other organisations without consent will be [reported to](#) and overseen by the Designated Safeguarding Lead.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views.

#### When concerns are directly shared by a child

Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

When children share the details of or feelings about abuse/harm; the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in their Appearance, Behaviour or other forms of communication (see [Recognise](#) section).

It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse, neglect, [exploitation and/or harm](#). There are many reasons why children do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

When children are sharing their concerns; staff should:

- **Listen to the child.** Please refer to this [NSPCC poster](#).
- **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- **Explain it can't be a secret.** Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
- **Reassure** and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- **[Seek the child's views](#):** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.

- **Explain** what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the [Reporting concerns](#) section.
- **Seek support** if you feel distressed (by talking to your line manager).

## Report

**Report in person** to the Designated Safeguarding Lead as soon as possible.

**Record** your concerns, decisions, actions and outcomes on the safeguarding recording system.

**If concerned about a member of staff or someone else in the school;** report in line with [Ensuring safe staff](#).

### Report to Designated Safeguarding Lead

All safeguarding concerns must be Reported to the Designated Safeguarding Lead as soon as they are recognised and after the initial response to the child and others. Staff are expected to verbally report their concerns to the Designated Safeguarding Lead.

Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow [Ensuring safe staff](#).

### Record concerns

All safeguarding concerns must be recorded by the staff member in writing using CPOMS. [Appendix D: Safeguarding Concern Reporting Form](#) physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map.

Each safeguarding concern record should include:

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

If staff are unsure of the recording requirements staff should seek advice from the Designated Safeguarding Lead.

## Designated Safeguarding Lead Response

Safeguarding concerns can be [raised by staff](#) as above; but may also be raised to the Designated Safeguarding Lead by:

- Children, parents, or visitors to the school.
- Other agencies (see [Working in Partnership](#))
- The school's ICT filtering and monitoring systems.

The Designated Safeguarding Lead will:

## Consider and assess the concern

Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The Designated Safeguarding Lead will use and refer to the following:

- [Working Together to Safeguard Children 2023](#) (particularly Chapters 1 and 3)
- [Keeping children safe in education](#)
- [SSCP Threshold Document](#)
- Other [relevant local tools and pathways](#) (West Midlands Procedures)
- If applicable [Appendix B: Child-on-Child Abuse Procedures](#)
- If applicable [Understanding and identifying radicalisation risk in your education setting](#)
- [When to call the Police - information for schools](#)

## Decide on what action to take

Once the concern has been considered and assessed; the Designated Safeguarding Lead will decide on action(s) to be taken. They may wish to delegate actions to other members of staff, in the best interests of the child. The DSL will assist the Headteacher with decisions to [Ensuring safe staff](#) in school.

In making decisions; the Designated Safeguarding Lead will work in partnership with the Headteacher; relevant staff/senior leadership team in line with their [Roles and Responsibilities](#) and any other organisations as appropriate (see [Working in Partnership](#) and [Record Keeping and Information Security](#)).

Actions could include one or more of the below

- **Manage internally:** in alignment with school policies and processes including offering support to the child and their family through the school pastoral support (Universal/School Early Help) offer in a way which addresses the needs/risks identified. This may also include actions to make locations/infrastructure in school (including online) safer; adapt the curriculum to ensure we are [Teaching our children how to keep safe.](#) ; or [Working in Partnership](#) .
- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring the child or their family enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise concerns to Children's Social Care** in line with the [SSCP Thresholds document](#) and [relevant local tools and pathways](#).
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police.

Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of [When to call the police: guidance for schools and colleges](#).

Other local referral processes will also be followed as applicable: including referring to relevant multi-agency forums and processes as outlined in [relevant local tools and pathways](#) (e.g. to [Prevent Radicalisation](#)); ensure [Online Safety](#); respond to domestic abuse: [Multi-Agency Risk Assessment Conference](#)).

## Record actions, decisions, and outcomes

On the child protection file and in line with [Record Keeping and Information Security](#). This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see [Working in Partnership](#)). The Designated Safeguarding Lead will keep detailed, accurate, written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency.

## **Manage and oversee any ongoing response**

Once the initial actions are taken, the Designated Safeguarding Lead will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided, they will ensure that the school [works in partnership](#) with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

The [SSCP Escalation/Resolution of Professional Disagreements Policy](#) will be used to challenge, resolve and if necessary escalate any concerns the school may have when working with other agencies in safeguarding children.

## Appendix A

Alternative Provision Quality Assurance Checklist			
Name of alternative provision:			
Name of person completing checklist (from host school):			
<p>All agencies and settings who place students at alternative provision MUST quality assure the placement.</p> <p>This quality assurance document must be completed prior to working with a new alternative provision and <b>annually</b> thereafter.</p>			
		<b>On file/ evidence of check</b>	<b>Date &amp; Initial</b>
1	If this quality assurance check is a review, please confirm the date of previous assurance check.		
2	<p>Is the alternative provision registered as an independent school with the DfE? Y/N</p> <p>The criteria to be registered as an independent school is that;</p> <ul style="list-style-type: none"> <li>- full-time<sup>1</sup> education is provided for five or more students of compulsory school age</li> <li>Or</li> <li>-full-time education is provided for one or more students with an EHC plan or who is “looked after” by a Local Authority</li> </ul> <p>1 - There is no legal definition of what constitutes ‘full-time’ education. However, DfE would consider an institution to be providing full-time education if it is intended to provide, or does provide, all, or substantially all, of a child’s education.</p>		
3	What is the provider’s DfE number? (If applicable)		
4	Copy of signed Service Level Agreement (SLA) /contract (attached)		
5	Is there a clear governance structure within the Alternative provision? Y/N		
6	Does the referral process include the requirement for a detailed student profile from the host school prior to agreement of placement? Y/N		
7	<p>Student’s attendance should be monitored daily. Is this included in the SLA? Y/N</p> <p>Copy of providers Attendance policy attached.</p>		
8	Is there a procedure for when students fail to attend or the placement breaks down? Y/N		
9	Is there adequate access to resources for all students who access the provision? Y/N		

10	<p>Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N</p> <ul style="list-style-type: none"> <li>- Pro-actively promote and support the regular attendance of students</li> <li>- Effective reward/incentive strategies to promote participation</li> </ul>		
11	<p>Is there regular assessment and review of student progress? Y/N  Provision agree to share weekly progress reports</p>		
12	<p>Are risk assessments completed for activities that students may undertake? Y/N (copy attached)</p>		
13	<p>Is there a full and clear student induction procedure regarding health and safety and fire evacuation? Y/N</p>		
14	<p>Are there robust procedures in place (including information sharing that are referenced in the SLA) to safeguard children in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N  Copy of providers Safeguarding/Child protection policy attached.</p>		
15	<p>Has evidence of staff receiving accredited child protection training been seen? Y/N  Has evidence of DSL receiving training for their role been seen? Y/N  Have contact details for DSL been provided? Y/N (attached).</p>		
16	<p>Copy of public liability insurance document attached.</p>		
17	<p>Is there a policy for when members of staff are working alone with students? Y/N (copy attached)</p>		
18	<p>Does the provider have an online safety policy in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N (copy attached)</p>		
19	<p>Copy of health and safety policy attached.</p>		
20	<p>Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N  Checks include;</p> <ul style="list-style-type: none"> <li>• an identity check;</li> <li>• a barred list check;</li> <li>• an enhanced DBS check/certificate;</li> <li>• a prohibition from teaching check;</li> <li>• further checks on people who have lived or worked outside the UK</li> <li>• a check of professional qualifications, where required; and</li> <li>• a check to establish the person's right to work in the United Kingdom.</li> </ul> <p>Has confirmation of these checks been added to the Single Central Record?</p>		

21	Is there a Designated First Aid Officer and suitable equipment available? Y/N <ul style="list-style-type: none"> <li>- Qualified First Aiders identified</li> <li>- Recording system for accidents including informing host school and home</li> <li>- Historical or current RIDDOR investigations</li> <li>- Evidence of full first aid kit</li> </ul>		
22	Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings when necessary? Y/N		

**Action Plan**

If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information

Action reference number.	Area for improvement	Intended action

Signed by host school:

Date:

Signed by Alternative Provision:

Date:

## Appendix B: Child-on-Child Abuse Procedures

We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff and Governors in our school to ensure they are adhering to and promoting the commitments we make in our [Safeguarding Statement](#).
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that our Designated Safeguarding Lead and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further details, please refer to [Professional Development and Support](#).
- Being clear how we expect our children to behave towards one another. Our Behaviour Policy outlines these expectations; how the school will support our children to understand and fulfil them; and how we will prevent and respond to behaviour which falls below our expected standards (including all forms of bullying). Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring we are [Teaching our children how to keep safe](#).
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that [Children who are more vulnerable to child-on-child abuse](#) are not disproportionately impacted by child-on-child abuse in our school.

### What is child-on-child abuse?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; we know that child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be supervised. We also know that where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways including, 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)
  - 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 sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - 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).
- A child may experience one or multiple types of child-on-child abuse at the same time.

## Children who are more vulnerable to child-on-child abuse

Please read this alongside [Children potentially at greater risk of harm](#).

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience<sup>2</sup> in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

Evidence<sup>3</sup> indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias<sup>4</sup>.
- Identify as Lesbian Gay, Bi-Sexual; Transgender (LGBT). These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
- Are male. Boys and are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

## When is child-on-child behaviour considered abusive?

We recognise the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse.

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<sup>2</sup> See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

<sup>3</sup> Evidence sources:

- Keeping Children Safe in Education 2025; Part 2: Children potentially at greater risk of harm.
- [Prevalence of bullying \(anti-bullyingalliance.org.uk\)](#).
- [Safeguarding d/Deaf and disabled children | NSPCC Learning](#);
- [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#);
- [Safeguarding LGBTQ+ children and young people | NSPCC Learning](#);
- [Spotlight #3: Young people and domestic abuse | Safelives](#).
- [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

<sup>4</sup> [Adultification bias within child protection and safeguarding \(justiceinspectors.gov.uk\)](#)

In considering whether behaviour is abusive, staff should consider:

- **The impact on the child(ren) affected by the behaviour:** Any behaviour that is likely to have an impact on a child's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the child's health and development; the greater level of harm caused to them.

The needs and circumstances of the child who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

Even where children do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (please refer further to [Staff Safeguarding Concerns: Recognise, Respond, Report](#))

Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given the impression they are creating a problem.

- **The behaviour of the child(ren) who is/are causing harm:** It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

Features of abusive behaviour<sup>5</sup> can include:

- A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
- A misuse of power over the child who is being harmed (please also see children who are more vulnerable above).
- Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
- Intrusive behaviour; not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
- An element of control; coercion and/or force.
- Physical/sexual violence (this does not always have to be present; but where it is so would heighten the level of concern).
- Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

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<sup>5</sup> Adapted from Hackett Continuum as described in [Understanding sexualised behaviour in children | NSPCC Learning](#). When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see [Farrer and Co \(2022\) page 35-36](#))

## Our response to child-on-child abuse

In most instances, we will use our Behaviour policy to manage the conduct of children towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the Designated Safeguarding Lead in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) section.

In responding to any concern of child-on-child abuse; we will take account of:

- Part 5 Keeping Children Safe in Education 2025.
- [Use of reasonable force in schools](#)
- [Searching, screening and confiscation at school](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [When to call the police: guidance for schools and colleges.](#)

## Risk and needs assessment

All staff will immediately consider how best to support and protect **all children involved** in child-on-child abuse incidents; ensuring they act in their best interests.

We may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the Designated Safeguarding Lead. This formal assessment will always take place where there is evidence of [violent or abusive behaviour](#).

The purpose of the risk and needs assessment is to safeguard **all children involved** (including children who may not be at the school, such as siblings) and will clearly outline the strategies to be put in place to mitigate risk and address any identified needs.

The risk and needs assessment will be completed; taking account of information from all key staff (and relevant involved professionals) working with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared with all staff and relevant involved professionals who work with the children, as well as parents/carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

In circumstances where children are displaying sexual behaviour towards other children that raises concern; our Designated Safeguarding Lead is trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment.

## Response

The parents/carers of **all involved children** will be notified of and involved in our response. We will only share the details of other children to parents/carers who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to [Record Keeping and Information Security](#))

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- **Manage internally** in alignment with our Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take account of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are [Teaching our children how to keep safe.](#); or [Working in Partnership](#).
- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring **any child involved** to enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise concerns to Children's Social Care** in line with the [SSCP Thresholds document](#).
- **Report to the Police.** We will take account of [When to call the police: guidance for schools and colleges](#).

## Recording and Monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the child protection files of all involved children (Please refer to [Record Keeping and Information Security](#)). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on GO 4 Schools.

## Appendix C: File Transfer Record and Receipt

**PART 1:** To be completed by sending / transferring setting, school or college.

NAME OF CHILD:	
DOB:	
NAME OF SCHOOL/SETTING SENDING CP FILE:	
ADDRESS OF SCHOOL/SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	BY HAND    SECURE POST ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANFERRING TO:	
SIGNATURE:	

**PART 2:** To be completed by receiving setting, school or college.

NAME OF SCHOOL/SETTING RECEIVING FILE:	
ADDRESS OF SCHOOL/SETTING RECEIVING FILE:	
DATE RECEIVED:	
NAME OF PERSON RECEIVING FILE:	
DATE CONFIRMATION OF RECEIPT SENT:	
SIGNATURE:	

**Receiving School:** Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.