Safeguarding Policy 2026
Hempstalls Primary School

This policy is available on our website and is available on request. We inform parents and carers about this policy when their child(ren) join our setting.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance.

Keeping Children Safe in Education

This policy will be reviewed in full by the Governing Body on an annual basis. This policy was last reviewed and agreed by the Governing Body on September 2026. It is due for review on September 2027

Signature	A.Bell	Headteacher	Date:02/09/2026
Signature		Chair of Governors	Date: 02/09/2026

The minutes of the Governing body clearly demonstrate where this Policy has been developed with the staffing group using their expertise and knowledge.

Publication date: 02/09/2026 Renewal Date: 01/09/2027

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Key Safeguarding Contacts

Role	Name	Date and level of safeguarding training
Headteacher	A Bell	
Designated Safeguarding Lead (DSL)	A Bell	
Deputy Designated Safeguarding Lead (DDSL)	J Hemmings	
Nominated Governor for Safeguarding	A Evans	
Chair of Governors	A Evans	
Designated teacher for Looked After Children	C Price	
Prevent Lead	A Bell	
Mental Health Lead	J Hemmings	
	S Barnett	
SENCO	C Price	
Attendance Lead	J Hemmings	

1. Purpose and aims

The purpose of our Safeguarding policy is to ensure that we:

- **Are committed** to developing a robust safeguarding culture of vigilance and challenge.
- **Build resilience** by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- **Establish a safe environment** in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- **Support vulnerable pupils** who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- **Prevent unsuitable people** from working with children by ensuring we practice safe recruitment in checking the suitability of **all** school staff, supply staff and volunteers to work with our children and maintain an active, ongoing vigilance in line with the safeguarding culture.

We follow the procedures set out by Staffordshire Safeguarding Children's Partnership, Working together to safeguard children 2026 and Keeping Children Safe in Education 2026 by **knowing** and **understanding** that:

- Safeguarding and promoting the welfare of children is **everyone's** responsibility and the **voice of the child** is evident.
- **Everyone** who comes into contact with children and their families has a role to play.
- **Everyone** should ensure that their approach is **child-centred** considering, at all times, what is in the **best interests** of the child.
- By establishing a safe environment, we enable our children to learn and develop within an ethos of openness.
- **No single practitioner** can have the full picture of a child's needs and circumstances.
- If children and families are to receive the **right help at the right time**, **everyone** who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

- The importance of providing children with a balanced curriculum including PHSE, healthy relationship education, online safety, making or sharing of nudes or semi-nudes, child-on-child abuse (including harassment and violence) as well as 'abuse outside the home' (County Lines, Child Criminal Exploitation incl Child Sexual Exploitation and other contextualised safeguarding issues). Also supporting this with online activities, enabling children to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Undertaking the role to enable children and young people at our school to have **best outcomes**.
- Ensuring that we have awareness of our staff's knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a **robust element** of our practice.

Our role is to:

- **Provide** help and support to meet the needs of children as soon as problems emerge
- **Protect** children from maltreatment, inside or outside the home, including online.
- **Prevent** impairment of our children's mental and physical health or development.
- **Ensure** that our children grow up in circumstances consistent with the provisions of safe and effective care.
- **Take action** to enable **ALL** children to have the best outcomes.

This policy provides guidance to **all** adults working within the school, whether paid or voluntary or directly employed by the school or a third party and should be read in conjunction with the documents Keeping Children Safe in Education 2026 and Working together to safeguard children 2026

- This policy is available on our website and on request from the main office. We will also inform parents/carers about this policy when their children join our setting/school/college.
- This policy will be reviewed in full by the Governing Body on an annual basis or sooner should legislation/guidance change.
- This policy sets out how the governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at this setting/school/college. Our policy applies to **all** staff; paid and unpaid, working in the school, including Governors.

- The policy is provided to **all** staff (including temporary staff, supply staff and volunteers) at the point of induction, alongside our Staff Code of Conduct policy.
- Our Governing Body, working with the senior leadership team and especially our Designated Safeguarding Lead (DSL), ensure that those staff who do not work directly with children will read at least Part of the KCSiE 2026 guidance.
- All staff who work directly with children, are provided with, and have read at least Part One of Keeping Children Safe in Education 2026.
- The school follows the Staffordshire Safeguarding Children's Partnership policies and procedures. StaffsSCP

2. **Our ethos and culture at** Hempstalls Primary School

At Hempstalls, our children's welfare is of paramount importance to us, and we are a child centred setting. Our children are reassured that they have a voice, will be listened to and what they say will be taken seriously. They know that they will be supported and kept safe. They will never be given the impression that they are creating a problem by reporting abuse.

Children are encouraged to talk freely with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never feel ashamed for making a report. Their views and wishes will inform any assessment and provision for them.

We make every effort to listen to and capture the voice of children to enable us to have a clear understanding of their daily lived experiences. This includes understanding that the child's presenting behaviours and observations by staff also form part of their voice.

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

This does not prevent **ALL** staff from using professional curiosity and speaking to the DSL if they have concerns about a child. Our staff determine how best to build trusted relationships with children which facilitate this communication.

We understand our statutory duty to safeguard and promote the welfare of children, and we maintain a professional attitude of ***'it could happen here'*** where safeguarding is concerned. We expect **ALL** staff, governors, volunteers, and visitors to share our commitment, maintaining a safe environment and a culture of vigilance.

Everyone has a responsibility to **act without delay** to protect children by reporting anything that might suggest a child is being abused, neglected or exploited. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. We work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours and these are dealt with appropriately and robustly. Staff do not accept these behaviours as 'banter', 'having a laugh' or 'part of growing up'.

All staff are encouraged to report concerns that they have and not to see these as insignificant. They **will** act on them immediately and report them to the DSL/DDSL.

Options of support will include:

- managing any support for the child internally via our own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment
- making a referral to statutory services for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

When dealing with safeguarding matters, we are conscious of the language and terminology we use, especially in front of children. Sometimes reference is made to a child who has been subjected to abuse, as a victim. However, not all children consider themselves a victim nor will they want to be referred to in this way. We are conscious of this and when managing any incident, we will be prepared to use terminology that children are most comfortable with.

In KCSiE 2026 guidance, reference is made to alleged perpetrator and perpetrator, however we will try to avoid using these terms and instead we will refer to children and young people who have 'displayed' or 'instigated' particular behaviours. We ensure that **all** children involved receive support.

We work closely with safeguarding partners, share the same goals, learn with and from each other, have what we need to help families, acknowledge and appreciate difference as well as challenging each other.

We acknowledge the four principles that as professionals we should follow when working with parents and carers:

- effective partnership and the importance of building strong, positive, trusting and co-operative relationships
- respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers
- empowering parents and carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources
- involving parents and carers in the design of processes and services that affect them.

We recognise the stressful and traumatic nature of safeguarding work, and support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate, this could take the form of clinical supervision. Education Support helpline-emotional support for education staff

3. Legislation, guidance and links to other school policies

This policy has been devised with due regard for the statutory guidance from the DfE Keeping Children Safe in Education 2026 (KCSiE) and this document is read alongside:

- Working together to safeguard children 2026
- Children's Wellbeing and Schools Act 2026
- Staffordshire Safeguarding Children Partnership Procedures
- What to do if you are Worried a Child is being Abused
- Behaviour in Schools - Advice for headteachers and school staff
- Please see the policy section on our website Anti-Bullying (incl cyber bullying), missing children, online safety, staff code of conduct, safer recruitment, restrictive intervention/reasonable force and whistleblowing.

4. The role of all staff in keeping children safe

All staff have read and have a good understanding of **at least part 1** of Keeping Children Safe in Education 2026 and are aware of the safeguarding link to other policies relating to their daily practice.

All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring–see para 171-175 for further information and Filtering and Monitoring standards). This training takes place at induction and is regularly updated. In addition, **all** staff receive safeguarding (including online safety) updates via (staff briefings/newsletters/7-minute briefings-contextualise as appropriate) as required, and at least annually, to

continue to provide staff with the relevant skills and knowledge to safeguard children effectively.

All staff know who the DSL/DDSL is and understand that as well as being the expert in this field, they are there to support staff, volunteers, and the Governing body.

All staff are aware of their responsibility to provide a safe environment in which children can learn.

All staff are aware of indicators of abuse, neglect, exploitation and modern slavery and understand that children can be at risk of harm inside and outside of our setting, inside and outside of their home and online. Staff are confident in exercising **professional curiosity** and understand that knowing what to look for is vital for the early identification of abuse, neglect and exploitation, to identify cases of children who may need our help or protection. They are aware that abuse, neglect, and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple harms do overlap one another.

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

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline.

Children can also abuse other children online; this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual-making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. This includes AI generated child sexual abuse material.

Guidance

- Using AI in education settings: support materials
- Generative artificial intelligence (AI) in education

All staff are also mindful that disinformation, misinformation and conspiracy theories can be an online safety risk/concern.

All staff know what to do if a child tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority children's social care. Staff never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. They are aware of their statutory reporting responsibilities and duty in relation to FGM.

All staff know how to reassure children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a child ever be made to feel ashamed for making a report.

All staff are aware of the early help process and understand their role in it and are confident to identify and support children who may benefit from early help, effectively giving children and their families the right help at the right time.

All staff are aware of the SSCP Right Help, Right Time Framework including the process for community-based Family Help and when a case should be referred. They are also aware of targeted early help level, and when statutory services are delivered under Section 17 and Section 47 of the Children Act 1989 (Para 13 KCSiE). They are aware of how to make a referral to children's social care~~,~~ along with their potential role in any ~~such~~ assessments.

All staff understand their responsibility to report concerns about the behaviour of any adult in our setting and know that they will be listened to and taken seriously.

All staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. * SSCP Escalation PolicyWhistleblowing Advice Line | NSPCC

5. The role and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead(s)(DDSL)

For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex B of Keeping Children Safe in Education 2026.

Our DSL/DDSL(s) have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and

skills to carry it out. Our DDSL(s) are trained to the same level as the DSL. Training received also supports their knowledge of the processes, procedures, and responsibilities of other agencies, particularly children's social care in line with Working together to safeguard children 2026.

This training is updated at least every 2 years and in addition to this they regularly (at least annually) refresh and update their knowledge and skills. The DSL is given **additional** time, funding, training, resources, and support needed to carry out the role effectively. e.g. DSL Briefings, networking with other DSLs, emails, reading statutory guidance.

Our DSL takes the **lead responsibility** for safeguarding and child protection (incl online safety as well as an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes in place, including requirements relating to the safe use and filtering of generative AI), and this is explicit in their job description.

Guidance:

- Filtering and monitoring standards for schools and colleges
- Generative AI expectations
- Plan technology for your setting

As part of online safety, we are aware of our responsibility for information security and access management, and we will ensure that we have the appropriate level of security protection procedures in place to safeguard our systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. We will take appropriate action to meet the Cyber security standards for schools and colleges in order to improve our resilience to cyber-attacks.

Guidance:

- Cyber security standards for schools and colleges
- Cyber Security Training for School staff
- NEN - The Education Network

During term time, the DSL/DDSL is available (during school hours) for staff in the school to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated.

To ensure continuity of safeguarding responsibilities, when the DSL is unavailable due to illness, leave, or other circumstances, we implement robust cover arrangements for these periods to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where

appropriate, involve other agencies, these are reviewed regularly and shared appropriately.
All staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can have a significant impact on a child's welfare, wellbeing, mental health, sense of belonging and willingness to seek help. Concerns relating to prejudice-based harm will be considered within safeguarding practice where appropriate and responded to in line with this policy.

Our DSL maintains robust systems to monitor and record training of **all** staff. Update and refresher time scales are evident within the training record. Training is delivered in-line with StaffsSC**P** and KCSIE 2026. This will include training and communicating/updating staff regarding safeguarding i.e. bulletins, newsletters, briefings, inset day training etc

The DSL ensures that **all** staff and regular visitors have appropriate safeguarding training to equip them for their role in school. This includes training on how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information accurately. The DSL ensures systems are in place to induct new staff/governors and that they are robust and monitored and any non-compliance shared with Senior Leadership Team/Governing body.

The DSL monitors the safeguarding management system My Concern to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the 'Data Protection Laws' (Throughout this policy, the term 'data protection laws' refers collectively to the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025).

The safeguarding records are kept in a secure location and away from academic records. T here is a robust process of the transfer, both in and out, of these records and clear recording of this.

When a parent chooses to remove their child/ren from school to receive Elective Home Education (EHE), the DSL will pass on any safeguarding concerns and the safeguarding file, if there is one, to the EHE Team (electivehomeeducation@staffordshire.gov.uk) and inform other professionals who may be involved with that child.

The DSL/DDSL monitors the quality of safeguarding files through auditing case files regularly. Appropriate and regular case supervision takes place

with the DSL and may be extended to other members of staff if we deem this appropriate.

The DSL/DDSL will refer cases of suspected abuse to the local authority children's social care, as required, and support other staff to make these referrals.

The DSL/DDSL understand the importance and need for attendance at Child Protection Case Conferences (both Initial and Review) and core group meetings as well as Child in Need meetings. The DSL/DDSL will represent education at these meetings and prior to conference, whether attending or not, MUST complete the Education Report prior to the Conference.

Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of child/ren.

The DSL/DDSL will notify children's social care if a child with a child protection plan is absent for more than two days without explanation.

The DSL/DDSL helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the schools and their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for these children including supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make.

The DSL has a good understanding of the community the school serves, the risks and its resilience - community links- /PCSOs and liaising with family hubs.

6. Our Governing Body

The Chair of Governors/CEO has attended appropriate training for dealing with safeguarding concerns or allegations made about, or concerns raised in relation to teachers, (including supply teachers and trainee teachers), other staff, volunteers, and contractors. They have read and understand Part 4 of KCSiE 2026 including Section One: Concerns or allegations that may meet the harm threshold and Section Two: Concerns or allegations that do not meet the harm threshold (low-level concerns).

At **Hempstalls** our Governing Body have a strategic leadership responsibility for safeguarding arrangements, and they **must** ensure that we comply with our duties under legislation. They **must** have regard to this

guidance in ensuring policies, procedures and training are effective and always comply with the law. See Part Two: The Management of Safeguarding in Keeping Children Safe in Education 2026. The Headteacher ensures that the policies and procedures, adopted by the governing bodies and proprietors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The Governing Body ensure that all staff, including governors and trustees, receive appropriate safeguarding and child protection training (including online which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will equip governors and trustees with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding and this training is regularly updated.

Our Governing body/proprietors ensure that online safety is a running and interrelated theme when devising and implementing our whole school/ college approach to safeguarding. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

We are aware of and follow the below guidance

- Generative AI in Education (new links)
- Online resources AI in Education which also contains important information re identifying and mitigating key risks associated with safeguarding, ethics, data protection, and intellectual property.

In considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our Governing Body will ensure that our school has appropriate filters and a monitoring system in place. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
The Governing body will review the following standards and discuss with IT staff and service providers what more needs to be done to support our setting in meeting this standard:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually

- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs.

Guidance:

- Filtering and monitoring standards for schools and colleges

The Governing Body are also aware of their responsibility to ensure that there is the appropriate level of security protection procedures in to safeguard systems, staff and learners and that they need to review the effectiveness of these procedures annually to keep up with evolving cyber-crime technologies. The Governing Body will ensure that appropriate action is taken to meet the Cyber security standards for schools and colleges to improve the resilience to cyber-attacks.

Guidance:

- Cyber security standards for schools and colleges
- Cyber Security Training for School staff
- NEN - The Education Network

The Governing body and proprietors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Technical Guidance on the Public Sector Equality Duty), and local multi-agency safeguarding arrangements. Further guidance is found in Keeping Children Safe in Education 2026 & Equality Act 2010-Advice for schools

The Governing body facilitate a whole school approach to safeguarding involving everyone in school, ensuring that safeguarding is at the forefront and underpins all relevant aspects of process and policy development. These systems, processes and policies operate with the **best interests** of our children at the heart of what we do.

The Governing body has appointed the Designated Safeguarding Lead (DSL) who takes **lead responsibility** for safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). This is explicit in their job description, and they ensure that the DSL understands their responsibility in leading safeguarding across the school. They also ensure that the DSL is given additional time, funding, training, resources, and support needed to carry out the role effectively. See Annex B Keeping Children Safe in Education 2026

The Governing Body has also identified a Deputy Designated Safeguarding Lead(s)(DDSL) and trained to the same safeguarding standard as the DSL.

The Governing body and proprietors ensure that children are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities.

We play a crucial role in preventative education preparing children for life in modern Britain creating a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These will be underpinned by the behaviour policy and pastoral support system, as well as by a planned programme of evidence-based allegation/RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Through our curriculum, children are supported to develop positive relationships, body confidence and self-esteem, and are taught about online harms, including the sharing of images, pornography, deepfakes, misogynistic influencers and where to seek help and support.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Resources

- Teaching about relationships, sex & health
- Teaching online safety in schools
- PHSE Association accredited lesson plans and resources
- Harmful online challenges and online hoaxes

The Governing Body will ensure compliance with the completion of the Local Authority annual safeguarding audit, via the Phew electronic system, to the Local Authority and that any areas of concern in safeguarding are identified and a safeguarding action plan is developed.

Our school also completes a trust wide safeguarding audit however this audit compliments and does not replace the statutory return to the local safeguarding partnership.

The Governing Body ensure that those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national

guidance. When candidates have been shortlisted, they will be made aware that online searches will be carried out.

- Part 3 Safer Recruitment Keeping Children Safe in Education 2026

Our Governing Body/Headteacher have ensured that there is a current whistleblowing policy, and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures (See Website)

Further guidance on whistleblowing is available here and the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: help@nspcc.org.uk

When the Governing Body or Proprietors hire/rent out school or college facilities/premises to organisations or individuals (e.g. community groups, sports associations, and service providers to run community or extra-curricular activities), they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body, this is not necessarily the case.

The Governing body/proprietor will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll/attend college.

The Governing Body will ensure that safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Lettings will not be made to persons under the age of 18, or to any organisation or group with an unlawful or extremist background.

Guidance: -

- After-school clubs, community activities & tuition

The Designated Teacher

The Governing body have appointed a Designated Teacher (DT) who works with the local authority to promote the educational achievement of registered pupils in our setting, who are looked after. Our Designated Teacher works across the school to promote educational outcomes and attendance for children in care using evidence-based interventions.

Our designated teacher also has responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care, outside of England and Wales. They are appropriately trained and have the relevant qualifications and experience.

The Designated Teacher works ~~closely~~ with the Virtual School to provide the most appropriate support, utilising Pupil Premium Plus funding, to ensure that they meet the needs identified in the child's personal education plan (PEP). They work with the Virtual School Headteacher to promote the educational achievement of previously looked after children.

The Designated Teacher has the details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and liaises as necessary regarding any issues of concern affecting the care leaver.

At Hempstalls we are attachment aware, and trauma informed and take a relational based approach to supporting our most vulnerable children and will work restoratively with children to improve their outcomes. lisa.wood1@staffordshire.gov.uk).

We are aware of the additional duties of the virtual school headteacher extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We understand the role that we play in improving outcomes for children with a social worker.

Virtual Headteacher Role-Children with a social worker

7. Working with parents/carers.

At Hempstalls we are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area.

When new pupils join our setting, parents/carers will be informed that we have a safeguarding policy and that we are an Operation Encompass setting. A copy of this policy will be provided to parents on request and is available on the website. Parents/carers will be informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL from making a referral to the local authority in those circumstances and where it is appropriate to do so.

To keep children safe and provide appropriate care for them, we require parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and **at least 2 contacts.**
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, Child Arrangement Orders.

The school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission, and the school has been supplied with the adult's full details in writing.

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of children being safe online and parents/carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents/carers to be aware of what their children are being asked to do online, including the sites they will ask to access and

be clear who from the school (if anyone) their child is going to be interacting with online.

We update parents about safeguarding through newsletters/ website/notice board in reception.

8. Early Help incl community-based Early Help & Family Help

Any child may benefit from support before statutory intervention, including from universal services and community-based **Early Help**, or the targeted early help level of **Family Help**.

If children do not require the support of statutory children's services, the DSL/DDSL will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate. They may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. (Working Together 2026)
This will be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. (Alternatively, qualified lead practitioners, not a social worker, who may lead assessments before statutory intervention can continue to lead work with families up to and including section 17.

All staff are particularly alert to the potential need for additional support for a child who

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

- is in a family circumstance presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol or other drugs themselves
- has returned home to their family from care
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child; and

The DSL ensures that **all** staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL/DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the **lead professional** in undertaking an early help assessment.

The DSL/DDSL will consider how the needs of different family members impact each other. This includes needs relating to education, mental and physical health, financial stability, housing, substance use and crime. We will also consider specific needs such as disabilities, those whose first language is not English, fathers or male carers, and parents who identify as LGBTQ.

The DSL/DDSL is aware of their local Family Hubs Staffordshire and knows how and when to refer families for this level of support and intervention.

Guidance documents can be accessed via the following links:

- SSCP Early Help
- SSCP Right Help Right Time Framework

9. Referrals beyond early help/family help

Child in Need (Section 17)

If the DSL/DDSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will seek parent/carer consent for a referral to local /appropriate authority children's social care. If parents do not give consent, but the child's needs are still not being met, the DSL may feel that a referral is still appropriate and will discuss these concerns with children's social care. Appropriate staff will attend Child in Need (CIN) meetings.

Child Protection (Section 47)

If the DSL/DDSL considers that a child is suffering, or likely to suffer, significant harm, they will refer to local/appropriate authority children's social care. It may be deemed appropriate for parents to be aware of the referral unless this would put the child at further risk of harm. If a decision is made to hold an Initial Child Protection Conference (ICPC), this will be

attended by an appropriate representative from our setting who understands their role and responsibilities under Working Together 2026. They will also attend subsequent Core Group meetings and Review Child Protection Conferences (RCPC).

We recognise that conferences can be upsetting for parents and we will work in an open, honest, and transparent way with parents and remain child focussed, and do this in partnership with our parents/carers where possible.

10. Escalation process

As part of our safeguarding practice, there will be occasions where we do not agree with decisions made by other professionals and we will work hard to resolve these differences in a restorative way, at a practitioner level. However, if we believe that concerns regarding a child are not being addressed and their outcomes are not improving, we will escalate our concerns in line with the SSCP Escalation Policy

11. A safer school culture

Safer Recruitment and Selection

At Hempstalls we pay full regard to Keeping Children Safe in Education 2026. Our safer recruitment and selection practices help to deter, reject or identify people who might abuse children. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate pre-employment checks, including criminal record checks (enhanced DBS checks), barred list checks, prohibition checks whether they are known to the police and/or social care, whether they have been disqualified from providing childcare and any relevant overseas information. Evidence of these checks is recorded on our Single Central Record. See Part Three: Safer Recruitment in Keeping Children Safe in Education 2026

Staff who have lived or worked outside the UK **will** undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Guidance

- Application process for criminal records checks overseas
- Regulated professions database

Separate children's barred list checks will only be undertaken where an individual will be engaging in regulated activity with children and:

- is permitted to start work before the Enhanced DBS Certificate with barred list information is available; or
- has worked in a post in a school, college or other relevant setting that brought them into regular contact with children or young people and that employment ended no more than three months before their appointment.

In either circumstance, all other appropriate pre-employment checks must have been completed, and the separate children's barred list check must be satisfactory before the individual begins work.

Where individuals subscribe to the DBS Update Service, the school may undertake status checks, in accordance with current guidance, to confirm that no new information has been added to their DBS certificate since its issue.

Where a self-employed individual is engaged to work in the school, the school will either obtain the required DBS check or verify that a DBS certificate obtained by the individual is at the appropriate level for the work being undertaken.

The school recognises that regulated activity includes work which involves teaching, training, instructing, caring for or supervising children, providing advice or guidance on their physical, emotional or educational wellbeing, driving a vehicle solely for children, or providing personal care or healthcare. The school will ensure that appropriate safeguarding and safer recruitment processes are applied to all staff, volunteers and others undertaking regulated activity with children.

The school will ensure that volunteers undertaking regulated activity with children are subject to the appropriate level of DBS and barred list checks in accordance with current legislation and statutory guidance.

The school understands and applies the statutory definition of regulated activity when determining safer recruitment processes, supervision arrangements and the level of pre-employment checks required for staff, volunteers, contractors and visitors.

The school will undertake additional safeguarding checks where required by legislation or statutory guidance. This includes where an individual moves

from a role that is not regulated activity into a role that constitutes regulated activity with children, where there has been a break in service of 12 weeks or more, or where concerns arise regarding an individual's suitability to work with children.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils. Relevant staff have undertaken appropriate training in Safer Recruitment.

One of the trained safer recruitment staff will be involved in **all** staff and volunteer recruitment processes and sit on the recruitment panel. A member(s) of the Governing Body has received Safer Recruitment training.

Induction

All staff will be made aware of the systems we have in place to support safeguarding. These are explained as part of staff induction, including:

- The Safeguarding policy
- The Behaviour policy
- The staff code of conduct policy
- The safeguarding response to children who go missing from education; and
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2026.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, ~~be~~ remain visible to other members of staff. Consideration should be given to:

- Informing another member of staff of their whereabouts in school, who they are with and for how long.
- Doors having a clear glass panel in them and where possible be left open.
- No volunteers and parent helpers will be left unsupervised with children or out of sight of the teacher or member of staff responsible for them. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Use of reasonable force and other restrictive interventions

There are times when the use of restrictive interventions, including reasonable force and seclusion will be lawful and necessary; for example, to keep individuals and the wider school/college community safe.

'Reasonable' means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. advice for schools is available Restrictive interventions, including use of reasonable force, in schools

If reasonable force and/or restrictive intervention is used, a record should be made and form part of the chronology on the child's safeguarding records and parents/carers informed at earliest opportunity. Consideration should be given to reflective discussions following the incident to debrief and understand the views of those involved, identify any lessons learned and recognise effective/good practice.

We will regularly review and analyse all incidents involving reasonable force and restrictive intervention to identify patterns, trends, triggers and any areas of concern. This analysis will be used to inform individual support plans, risk assessments, staff training needs and any necessary changes to practice, policy or the learning environment. The purpose of this review is to promote a culture of learning and continuous improvement, reduce the need for restrictive interventions and ensure that children are supported in the safest and most effective way possible.

12. Keeping Children Safe in Education 2026 - Specific Safeguarding issues.

All staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and put them in danger and that often these issues overlap. Please read and refer to Appendix 2 for additional information and guidance on the below topics.

- Abuse (incl. Physical/Emotional/Sexual/Neglect)
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (including harassment and violence)
- Children and the court system (5-11yrs & 12-17yrs)
- Children missing from education
- Children who are absent from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)

- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness and Perplexing Presentations
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking

For further information, advice and guidance see Annex 2 of this document.

13. Children potentially at greater risk of harm

All children should be protected however our staff and Governing Body recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups:

- Children who need a social worker (Child in Need & Child Protection)
- Children who are absent from education
- Children who are Elective Home Educated (EHE)
- Children requiring mental health support
- Looked after children (LAC), previously looked after children (PLAC) and care leavers.
- Children with special educational needs & disabilities or health needs.
- Children who are lesbian, gay, bisexual (LGB)
- Children who are questioning their gender
- Children who are young carers
- Children who are affected by parental conflict and/or domestic abuse
- Children who are refugees or asylum seekers
- Children vulnerable to/at risk of/involved in CSE/CCE

We support these groups by having:

- **Vigilance**: to have adults notice when things are troubling them

- **Understanding and action**: to be heard and understood; and to have that understanding acted upon.
- **Stability**: to be able to develop an on-going stable relationship of trust with those helping them.
- **Respect**: to be treated with the expectation that they are competent, rather than not.
- **Information and engagement**: to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation**: to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.
- **Support:** to be provided with support in their own right as well as a member of their family.
- **Advocacy**: to be provided with advocacy, to assist them in putting forward their views.

Children with special educational needs, disabilities or health issues

We recognise that children with Special Educational Needs and Disabilities (SEND), and those with certain medical or physical health conditions, can face additional safeguarding challenges both online and offline. Staff are aware that additional barriers can exist when recognising abuse, neglect and exploitation in these children.

These barriers can include:

- assumptions that indicators of possible abuse, neglect or exploitation, such as behaviour, mood changes or injuries, relate to a child's disability, special educational need or health condition without further exploration;
- increased vulnerability to peer isolation, bullying, including prejudice-based bullying, and exploitation;
- being disproportionately impacted by harmful behaviours, including bullying, without outwardly displaying signs;
- communication barriers which may make it more difficult for a child to recognise, understand, disclose or report abuse;
- the need for intimate care and increased dependency on adults;
- reduced opportunities to develop protective relationships due to isolation from peers; and
- difficulties in understanding risks, including online risks, and distinguishing between fact and fiction, which may increase vulnerability to abuse, manipulation or exploitation.

Any safeguarding concerns involving a child with SEND will be considered in the context of their individual needs and circumstances. The Designated Safeguarding Lead (or Deputy DSL) will work closely with the Special Educational Needs Co-ordinator (SENCO) and other relevant professionals to ensure that children with SEND receive appropriate support, protection and

opportunities to have their voice heard. Schools and colleges should also consider whether additional pastoral support, communication support or reasonable adjustments are required to safeguard these children effectively

Children who are questioning their gender

We are aware that there has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

We will take the time to understand the thoughts and feelings of children who are questioning their gender and will be appropriately professionally curious about the full range of their experiences. We will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, e.g. relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

We will ensure that any arrangements relating to toilets, changing facilities, physical education and other aspects of school life are managed in accordance with current statutory guidance, safeguarding requirements and equality duties. Where alternative arrangements are considered for a child who is questioning their gender, decisions will be made on an individual basis, taking account of the safety, privacy, dignity and wellbeing of all children. Appropriate records will be maintained, arrangements communicated to relevant staff and reviewed regularly.

We recognise that some sports and physical activities may be organised according to a child's biological sex where this is necessary to ensure safety or fairness. Any requests regarding participation in sport or physical education will be considered on an individual basis, taking account of safeguarding considerations, the child's best interests, the impact on other pupils, and the need to maintain safe and fair participation in physical education and sport.

We understand that it is not for us to initiate any action in this area; the guidance is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding. (KCSiE will support and guide practice).

Elective Home Education

We are aware that many home educated children have a positive learning experience, however, this is not the case for all children. It can mean that they will not receive a suitable education and are less visible to the services

and professionals that are there to keep them safe and supported in line with their needs.

When a parent/carer expresses that their intention is to remove a child from school with a view to educating at home, we will work with the local authority and other key professionals, where appropriate, to coordinate a meeting with parents/carers where possible. We will attempt to do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

In accordance with the School attendance-pupil registration we will inform the Elective Home Education department including any safeguarding concerns as well as transferring any safeguarding files.

Where a child has an Education, Health and Care plan, the local authority will need to review the plan, working closely with parents/carers. We are aware of the guidance Elective home education

Young carers

We recognise that young carers may have additional needs and can be vulnerable where their caring responsibilities affect their wellbeing, attendance, attainment or ability to participate fully in school life. **All** staff will be alert to indicators that a child may be providing care or support to a family member and will share concerns with the DSL/DDSL. We will listen to the child's views, consider their needs within the wider family context and work sensitively with parents/carers and relevant agencies to identify appropriate support at the earliest opportunity. Where necessary, this may include community-based Early Help, Family Help or a referral to children's social care if there are safeguarding concerns or the child's needs are not being met.

Alternative Provision

We recognise that the cohort of pupils in Alternative Provision often have complex needs and our Governing bodies/proprietors/DSL are aware of the additional risk of harm that these pupils may be vulnerable to. When a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil, including knowing where they will be based during school hours.

This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will ensure that regular reviews of the provision take place frequently (at least

half termly) to ensure the placement continues to be safe and meets the child's needs.

Prior to the placement, and throughout the duration, we will ensure that appropriate safeguarding information is shared with the provider, including any known risks, vulnerabilities, safeguarding concerns, risk assessments, SEND information and relevant support plans. We will identify named safeguarding contacts within both settings and ensure that safeguarding concerns, incidents and attendance issues are communicated promptly.

We will maintain oversight of the pupil's attendance, welfare and engagement whilst attending alternative provision. Any unexplained absence, reduced attendance or welfare concerns will be followed up promptly and considered within the wider safeguarding context.

Before commissioning a placement, we will satisfy ourselves that the provision is suitable for the pupil's age, ability, aptitude, SEND and safeguarding needs. This will include consideration of the environment, staffing arrangements, safeguarding procedures, behaviour management arrangements and any specific risks identified for the child.

Where transport arrangements form part of the placement, we will consider and assess any safeguarding risks associated with travel to and from the provision.

We will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment, including written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), enabling us to assure ourselves that appropriate safeguarding checks have been carried out on new staff. We understand that we remain responsible for the provision we commission and will continue to carry out safeguarding checks and conduct our own due diligence to ensure that the provision is appropriate for meeting the child's individual needs.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

See below guidance: -

- Alternative provision
- National Standards for non-school Alternative Provision
- Education for children with health needs who cannot attend school

Work Experience Placements

The school will ensure that appropriate safeguarding arrangements are in place for pupils undertaking work experience placements. Prior to the placement commencing, the school will seek assurance that the placement provider has suitable policies and procedures in place to safeguard and promote the welfare of children. Where adults supervising pupils are undertaking regulated activity with children, appropriate safeguarding checks and assurances will be sought in accordance with current legislation and statutory guidance. Appropriate risk assessments will be undertaken where necessary.

14. Visitors

We have a range of visitors attending our setting including educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. We also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events such as sports days. (For visitors provided through a third party, see paragraphs 362-365 KCSiE).

We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. Headteachers and principals should use their professional judgement about the need to escort or supervise such visitors.

For visitors who are there in a professional capacity, we will check ID and seek assurance, that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks). We will **not** ask to see the certificate in these circumstances). Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration should be given to the suitability of any external organisations.

We will ensure that where individuals come onto our premises that we consider the following: -

- assessing the education value,
- the age appropriateness of what is going to be delivered and
- whether relevant checks will be required.

This will form part of the risk assessment including our professional judgement and we will consider whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so, we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.
- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check.
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be "reasonable in all the circumstances to ensure the protection of children" as stated in KCSIE 2026.
- We have clear visitor's procedure that enables us to offer pupil experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the school.

15. Allegations made against/concerns raised in relation to teachers, including trainee teachers, supply teachers, other staff, volunteers, and contractors

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the children in our setting. We take all possible steps to safeguard our children and to ensure that the adults are safe to work with children. However, we do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The Governing Body ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, trainee teachers, volunteers, and contractors:

- Allegations that **may** meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold, referred to for the purposes of this guidance as '**low level concerns'**.

Allegations that **may** meet the harms threshold

We have an understanding and give due regard to Part 4 of KCSiE 2026 and Allegations of Abuse SSCP

The procedures for managing allegations apply to all adults working in or on behalf of the school, including supply staff, contractors, volunteers and

trainee teachers. Where it is alleged that someone working in our setting (regardless of whether this is where the alleged abuse took place) has:

- behaved in a way that has harmed a child or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Then we will ensure that: -

- this will be referred to the headteacher or principal, who will consider whether an onward referral to the LADO is required,
- if there is a concern/allegation about the headteacher or principal, this will be referred to the chair of governors, chair of the management committee or proprietor of an independent school, and
- in the event of a concern/allegation about the headteacher, where they are also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this will be reported directly to the LADO(s).

(If the Headteacher or Chair of Governing Body is not contactable on that day, the information will be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of Governors).

Advice from the Local Authority Designated Officer (LADO) will be sought within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Where concerns or allegations relate to a supply teacher, contractor, trainee teacher or other individual not directly employed by the school, the school will work closely with the employment agency, provider and the LADO, where appropriate. Whilst the employer or agency will usually lead any employment or disciplinary procedures, the school remains responsible for gathering information and managing the safeguarding process.

Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police. If we are not the employer of an individual, we still have the responsibility to ensure allegations are dealt with appropriately. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

Our Governing body/proprietor will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Referrals to LADO in Staffordshire are made via the LADO Referral form

We recognise our legal duty to make a referral to the Disclosure and Barring Service (DBS) where an individual has been removed from regulated activity or would have been removed had they not left their employment or ceased volunteering, because they have harmed, or posed a risk of harm to, a child or vulnerable adult, engaged in relevant conduct, or satisfied the harm test. This duty applies to both paid staff and volunteers engaged in regulated activity. Referrals will be made as soon as possible and in accordance with statutory guidance.

Where a teacher's employer dismisses a teacher, or would have dismissed them had they not resigned, because of serious misconduct, the school will consider whether a referral should be made to the Teaching Regulation Agency (TRA) in accordance with statutory guidance. The TRA will consider whether the case should be referred to the Secretary of State for consideration of a prohibition order.

Learning lessons

It is important that lessons are learnt when managing all levels and types of allegations and the headteacher/case manager will review the circumstances of all substantiated cases with Staffordshire's LADO to determine whether improvements can be made to the school/college's procedures to help prevent similar events in the future. This will be done throughout the entirety of the process and at conclusion.

Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

Where an allegation is concluded to be either unfounded, false, malicious or unsubstantiated the headteacher/case manager (and if they have been involved the LADO) will consider the facts of each case and determine whether any lessons can be learned, and improvements made.

Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'

We promote an open and transparent culture in which **all** concerns about adults are dealt with promptly and appropriately. Creating this culture enables

us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that adults who work in or on behalf of our school are clear about professional boundaries and act within them in accordance with our ethos and values.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school/college's low-level concerns policy/Staff Code of Conduct. (Part 4 KCSiE).

Low level concerns

Low level does not mean that the concern is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the school may have acted in a way that is:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

All staff have a good understanding of what constitutes a low-level concern, and our governing body ensure that these low-level concerns are included as part of our staff code of conduct/safeguarding policies.

Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

If we are in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold, we will consult with the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors and contact knows to contact the LADO via the LADO referral form.

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

16. Information sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes and we have clear powers to share, hold and use information for these purposes. As part of meeting a child's needs, our Governing body recognise the importance of information sharing between practitioners and local agencies and this includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

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

When we are making decisions on what information to share, we will consider: -

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

We will use our professional judgement to ensure that the information shared is focused and proportionate. This may include summarising or

omitting information, which is not necessary for safeguarding purposes, but we will take care not to omit information where it may be relevant to understanding or manage safeguarding risk.

Governors/Proprietors ensure that relevant staff have due regard to the relevant data principles, allowing the sharing (and withholding) of personal information as provided for in the data protection laws. This includes; -

- being confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share 'special category personal data'. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk, and
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. Where in doubt we will seek independent legal advice.

Our Governing body are aware that among other obligations, the 'data protection laws' place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Our Governing body/proprietors ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the 'data protection laws'.

Where children leave our setting, the DSL/DDSL will ensure that any safeguarding file is transferred (separately from the main school file) to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new setting to have support in place for when the child arrives. They will ensure secure transit, with confirmation of receipt being retained. The DSL will ensure key staff are aware of relevant information, as required.

In addition to the safeguarding file, our DSL will consider if it would be appropriate to share any information with the new setting in advance of the child leaving, particularly where the information supports an assessment of risk to others, as well as the individual pupil. For example, information that would allow the new setting to continue supporting children who have had a

social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours. If the information indicates any risk to others or themselves, the DSL will put in place a safety and support plan.

The 'Data Protection Laws' do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children.

Guidance documents:

- Paragraph 138-150 KCSiE
- Working Together 2026
- Information sharing advice
- Guide to sharing information to safeguard children in education
- Data protection-toolkit for schools

17) Managing complaints

We encourage children/parents/carers to talk to us if they are unhappy with anything to do with our setting, we seek to resolve these issues swiftly and restoratively. We have a robust internal investigation process, and our complaints policy is easily accessible on our website for parents/carers and is also available on request states. The policy explains the various stages of complaint and where to escalate concerns following completion and outcome of our complaints process.

Safeguarding concerns should be raised with us immediately. If a concern means a child is at immediate risk, we will contact children's social care based on where the child resides. All visitors are given safeguarding information which outlines how to share concerns and code of conduct expected by visitors/contractors.

18. Site Security

At Hempstalls we understand the importance of site security, which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on our site must adhere to the rules which govern it. We will ensure that staff, children and parents/carers understand how to keep the site safe and what to do if they are worried. Gates are kept closed during the school day; visitors gain access through the main entrance.

- Visitors, volunteers, and students only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass.
- School has a clear system of ensuring staff are accompanied/supervised by regulated staff member. Any visitor on site who is not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Senior Leadership Team.
- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate school events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Empty classrooms should have closed windows and doors.
- Children should never be allowed to leave school alone during school hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.
- At least two members of staff are always on duty at break times.
- A health and safety audit are completed annually with risk assessment/safety planning and forms part of the Governors annual report. This will include a fire evacuation and Prevent risk assessment.
- The risk management of site security is managed by senior leaders/governance, and we have a clear system of risk assessments and review timescales of these.

Guidance

- School and college security - GOV.UK

20) Early years foundation

The Early years foundation stage (EYFS) statutory framework is mandatory for all early years' providers within maintained schools; non-maintained schools; independent schools; all providers on the Early Years Register. Every child deserves the best possible start in life and the support that enables them to fulfil their potential. Children develop quickly in the early years and a child's experiences between birth and age five have a major impact on their future life chances. A secure, safe and happy childhood is important in its own right. Good parenting and high-quality early learning together provide the foundation children need to make the most of their abilities and talents as they grow up.

The Early Years Foundation Stage (EYFS) sets the standards that all early years' providers must meet to ensure that children learn and develop well and are kept healthy and safe. It promotes teaching and learning to ensure children's 'school readiness' and gives children the broad range of knowledge

and skills that provide the right foundation for good future progress through school and life.

For our staff who work in childcare provision or who are directly concerned with the management of such provision, the setting needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Child Care (Disqualification) Regulations 2018. Further information on the staff to whom these regulations apply, the checks that should be carried out, and the recording of those checks can be found the following document (2nd bullet point within the document).

Guidance documents:

- Early years foundation stage (EYFS) statutory framework

We ensure that at least one person with a current paediatric first aid certificate, must always be on the premises and available when children are present and must accompany children on outings.

- How mobile phones, cameras and other electronic devices (including smart watches and glasses) with imaging and sharing capabilities are used in the setting.
- Procedures to follow to check the suitability of new recruits
- Suitability of new recruits
- Details of how safeguarding training is delivered and how practitioners are supported to put this training into practice (Annex C Page 53)
- Whistleblowing (Page 23 3.7-3.8)
- Child absence (Page 24 3.11-3.12)
- Staff ratios (Page 30-34)
- Safer eating (P36 3.63-3.70)
- Toilets and intimate hygiene (Page 40 Section 3.86 Point 3)

Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

If you have any concerns about a child or young person in our school, you must share this information immediately with our Designated Safeguarding Lead A Bell or Deputy Designated Safeguarding Lead J Hemmings.

Do not think that your worry is insignificant if it is about hygiene, appearance, or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the Designated Safeguarding Leads and provide them with a written/electronic record of your concern. A copy of the form to complete is attached to this and others can be obtained from …… Please ensure you complete all sections as described.

If you are unable to locate them, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the Head teacher. If an allegation is made about the Head teacher, you should pass this information to the Chair of the Governing Body. Alternatively, you can contact the Local Authority Designated Officer via the LADO Referral form

The people you should talk to in school are:

- Designated Safeguarding Lead:
  Location of office:
  Contact Number:
- Deputy Designated Safeguarding Lead:
  Location of office:
  Contact Number:
- Chair of Governing Body:
  Contact Number:

Appendix 1

Definitions and Indicators of Abuse & Neglect

1. **Abuse**; 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 experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

3. **Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

4. **Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or penetration with an

object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. We refer to and/or use the resources on the CSA Centre

5. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

We will refer to and/or use the resources Neglect-SSCP

Parental response

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (e.g. a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.

- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

Disabled Children-When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

Appendix 2

Specific safeguarding issues

Behaviours linked to safeguarding issues

All staff have an awareness that safeguarding issues often overlap. Presenting behaviours of children and indicators can be signs that children are at risk of harm such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence, criminal exploitation (including links to county lines), radicalisation and non-consensual making or sharing of nudes or semi-nudes can be signs that children are at risk. (Annex A KCSiE 2026)

Bullying, including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including the making or sharing of nudes or semi-nudes)

Guidance on bullying can be Preventing & tackling bullying

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

All staff recognise that children can abuse other children and that it can happen both inside and outside of our setting and online (often referred to as child-on-child abuse). They are clear about our policy and procedure regarding child-on-child abuse. We have anti-bullying and behaviour policies to guide, inform and support children, staff and parents/carers. (Insert links)

All staff are aware that child-on-child abuse is a safeguarding issue for all children involved, regardless of their role in the incident, and that it is likely to have an adverse impact on their educational attainment and wellbeing. Child-on-child abuse exists on a continuum, can occur both online and offline, and may involve physical, sexual, verbal, emotional or financial abuse. Such behaviour is never acceptable and will never be dismissed as banter, part of growing up, or "just having a laugh".

All staff understand the important role they have to play in preventing and responding where they believe a child may be at risk from abuse. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

All staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of:

- Making clear that child-on-child abuse (including harassment and violence) is never acceptable and that that we have a zero-tolerance approach.
- Not dismissing this abuse as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

All staff know that if we do not challenge and support our children that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. This includes being alert to when children might be at highest risk, either side of the school/college day and at unstructured times such as breaks/lunchtimes.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure children that their reports are being taken seriously and that they will be supported and kept safe. We never give the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our children feel confident their concerns will be treated seriously. Allegations of child-on child abuse will be recorded, investigated, dealt with and children supported.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college will not be downplayed and will be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting child on child abuse and should never be made to feel ashamed for making a

report. We will ensure that children know that the law is in place to protect them rather than criminalise them, and we will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND children who are lesbian, gay or bisexual, and children who are questioning their gender are at greater risk. We also recognise that, for some but not all forms of child-on-child abuse, girls are more likely to be harmed, and boys are more likely to display harmful behaviours. However, all child-on-child abuse is unacceptable and will be taken seriously regardless of the sex or gender of those involved. The DfE states that child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of child-on-child abuse will be supported by the school's pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management. Where appropriate, children involved may be offered support through universal services, community-based Early Help, targeted Early Help through Family Help, pastoral support or other specialist services. Early Help may be considered for both the child who has experienced the behaviour and the child displaying the behaviour, alongside any internal management arrangements.

All staff understand that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such if staff have any concerns regarding child-on-child abuse, they will speak to the Designated Safeguarding Lead (DSL) or deputy (DDSL). Our staff will not develop high thresholds before acting.

Harmful sexual behaviour (HSB) is an umbrella term used to describe sexual behaviours that exist on a continuum and may range from developmentally expected through to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may be harmful to the child or others. HSB can occur online, offline or both and all incidents will be considered within a child protection context.

When assessing harmful sexual behaviour, the age, developmental stage and individual needs of the children involved will always be considered. Staff recognise that harmful sexual behaviour may involve power imbalances and that abuse can occur between children of any age. A younger child may abuse an older child, and behaviour may be harmful where there is a significant age difference, developmental difference or imbalance of power between those involved.

Staff understand that consent must be freely given and can be withdrawn at any time. They recognise that a child under the age of 13 can never consent to any sexual activity and that sexual activity without consent is unlawful and may constitute a criminal offence.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- 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 and may include an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- Misogynistic behaviour, language or attitudes directed towards girls and young women.
- 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.
- Making, creating, possessing, sharing or threatening to share nudes or semi-nudes, including AI-generated content, whether consensually or non-consensually. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- 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).

All staff are aware of the importance of understanding child sexual abuse in the family environment (CSAFE) previously referred to as intra familial harms and any necessary support for siblings following incidents.

The school will regularly review safeguarding, behaviour and child-on-child abuse incidents to identify patterns, trends or emerging concerns. This information will be used to inform staff training, curriculum development, risk assessments and wider preventative safeguarding measures.

Guidance Documents:

- CSA Centre
- Hackett Tool
- Disrespect NoBody campaign
- CEOP-Safety centre
- UKCIS Guidance: Sharing Nudes & Semi-Nudes
- Review of sexual abuse in schools & colleges
- Searching, screening and confiscation in schools
- Sharing nudes and semi-nudes-Advice for education settings
- Undressed-LGFL

Children who are absent from education incl CME

If our children are absent from education, particularly repeatedly and/or for prolonged periods, this will act as a vital warning sign of a range of safeguarding issues, including abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of; substance abuse, travel to conflict zones, female genital mutilation, honour or faith-based abuse or forced marriage.

We understand that early intervention in these cases, when problems are first emerging, is essential in trying to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future and prevent the risk of them becoming a Child Missing Education in the future. It is important of **all staff** to be aware of our unauthorised absence procedures and Children Missing Education (CME) procedures.

We understand our responsibility to link school absence with the impact this has on the child's education. We know that there is a distinction between a child being absent and when they are subject to a missing episode and the importance of acting on this information and reporting a missing episode when appropriate. We have a key role in sharing information with the police and any lead practitioner involved with the family when a child is reported missing. We will provide, when required, an appropriate environment for a Return Home Interview (RHI) within the education setting, where possible and will contribute to safety planning when required. We will follow our attendance policy for children who are regularly and persistently absent.

We hold **at least 2** emergency contact numbers for each pupil. If a child goes missing from our school and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

If a child is not known to the Local Authority or other agencies but there are remaining safeguarding concerns, we will consult the Right Help Right Time Document and ensure that any concerns are reported to the appropriate agencies/partners.

Further guidance:

- Working together to improve school attendance
- Children missing education
- Full-time enrolment of 14-16yr olds in FE & 6th form colleges
- Missing children & adults strategy

Children Missing from Home or Care

There are strong links between children involved in criminal and/or sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document:

- Children who run away or go missing from home or care

Child Criminal Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery Guidance

We are aware of the Child Exploitation Risk Screening Tool and complete this at the earliest opportunity to understand the risk factors in a child's life.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.

- children who go missing for periods of time or regularly come home late.
- children who regularly miss school or education or do not take part in education.

Guidance documents:

- Safeguarding children who may have been trafficked
- Child Exploitation-SSCP

Child sexual exploitation (CSE)

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- Child Sexual Exploitation Definition & Guidance

County Lines

County lines is a form of criminal exploitation and if a child is identified as a potential victim of county lines exploitation, then the relevant safeguarding

and modern slavery referrals should be completed in line with Modern Slavery statutory guidance .

It is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

We understand that children can be targeted and recruited in a number of locations including any type of education setting (including special schools, further and higher educational institutions, pupil referral units, children's homes and care homes).

Children are also increasingly being targeted and recruited online using social media and can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home,
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime),
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs,
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection,
- are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity,
- owe a 'debt bond' to their exploiters, and • have their bank accounts used to facilitate drug dealing.

When a victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered via the Police. Further information can be found here National Referral Mechanism

Guidance Document:

- Child exploitation disruption toolkit
- County Lines Toolkit for Professionals

Children with medical conditions and their safeguarding

We recognise that if there has been an incident relating to the management of a child/young person's medical condition (including allergies), this would not always in itself warrant a referral to local safeguarding partners. However, in certain circumstances a referral may be appropriate where an incident has highlighted concerns that the child/young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child's/young person's medical condition is not provided to our setting, or where they are repeatedly sent without essential medication, thereby putting them at risk.

See guidance for further information;

- Supporting pupils with medical conditions
- Allergy safety in schools

Domestic Abuse (DA) incl Operation Encompass and Parental Conflict

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We know that children can be victims of domestic abuse in their own right if they see, hear, or experience the effects of abuse at home. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life, including intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or care giver abuse. All of which can have a detrimental and long-term impact on their health, well-being, and ability to learn. We will support all children in these relationships.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Our commissioned service for DA in Staffordshire is New Era

Further guidance and resources:

- Domestic Abuse-Signs Symptoms Effects
- Safe Young Lives-Young people and DA

- Controlling and coercive behaviour
- Specialist sources of support

Elective Home Education (EHE)-See above in vulnerabilities

Parental Conflict

Parental conflict can have a significant impact on a child's emotional wellbeing, behaviour, development and educational outcomes. Staff should be alert to the potential effects of frequent, intense or unresolved conflict between parents or carers, whether they live together or apart. While parental conflict is not in itself a safeguarding concern, prolonged or harmful conflict may adversely affect a child's wellbeing and, in some circumstances, may indicate the need for additional support or safeguarding intervention. Where parental conflict is impacting on a child's welfare, staff will seek to provide appropriate support, work with other agencies where necessary, and consider whether safeguarding concerns are present.

Operation Encompass

Staffordshire Police have a statutory duty to notify the DSL/DDSL when they have reasonable grounds to believe a child who attends our setting may be a victim of domestic abuse. (This includes all children connected to the household, those who are physically present at the incident, those not physically present during the incident, and situations where a child might reside in another household temporarily or permanently).

An Operation Encompass notification will be sent to the DSL/DDSL via secure email, and we understand our responsibilities to comply with data protection laws when dealing with this personal and sensitive information. Our DSL/DDSL have completed the National Operation Encompass training, and we are an Operation Encompass setting.

This training and the notification enable us to provide emotional and practical help to the child/children named within the notification. It ensures that we have up to date relevant information about a child's circumstances and enables immediate support to be put in place, according to the child's needs. This support may take different forms e.g. checking in with the child, through observations and ensuring that the child has a trusted adult.

Where appropriate, we will make a referral to local authority children's social care if we are concerned about a child's welfare.

If you require further information re Operation Encompass, please use this link Operation Encompass (helpline 0204 513 9990-8am-1pm Mon-Fri)

Guidance Documents:

- NSPCC-Domestic Abuse
- Refuge-Domestic abuse & effects on children
- Domestic abuse: specialist sources of support

Drugs

We are aware that there is evidence of children and young people being increasingly involved in the misuse of alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation. We are also aware of the impact of parental drug misuse. Where appropriate, we will make a referral to local authority children's social care if we are concerned about a child's welfare.

Guidance Documents:

- NSPCC-Parental Substance Misuse
- Drugs Advise for Schools
- From harm to hope: A 10-year drugs plan to cut crime and save lives
- Honest information about drugs

Fabricated or Induced Illness (FII) & Perplexing Presentations (PP)

Fabricated or Induced Illness (FII) is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause. There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.

Perplexing Presentations are concerns raised around medically unexplained symptoms or concerning parental behaviours around child's health, by a non-medical professional.

In Staffordshire we use the following guidance:

- FII-PP Pathway
- NHS-Overview-Fabricated or Induced Illness

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into children's social care where a child has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

Honour or Faith based Abuse including female genital mutilation and forced marriage

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important for us to be aware of the dynamic and additional risk factors, when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. We understand that professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they will speak to the DSL/DDSL who will follow local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical

benefits. FGM is also linked to domestic abuse, particularly in relation to "honour or faith based abuse".

Staff are aware of the FGM mandatory reporting duty for teachers places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents: -

- National FGM Centre
- Multi-agency guidance-FGM
- Female Genital Mutilation Act 2003

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered **without** the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage, these threats can be physical, emotional and/or psychological. This could be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived cultural practices, to coerce a person into marriage. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Any disclosure that indicates a young person may be facing a forced marriage will be taken seriously as this could be 'one chance to save a life'. We understand that we play an important role in safeguarding children from forced marriage. We recognise that there are significant differences between a referral for a forced marriage concern and other child protection referrals.

As professionals, we are aware that sharing information with parents, extended family, or members of their community, could put the young person at significant risk.

Even if violence, threats or another form of coercion are not used, it is still a crime to cause a child to marry before their eighteenth birthday. (All of the above circumstances apply to non-binding, unofficial and legal marriages).

Guidance Document:

- Advice available from the Forced Marriage Unit: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.
- Forced Marriage
- Forced Marriage resource pack
- The right to choose: government guidance on forced marriage
- Faith Based Abuse-National Action plan

Mental Health & Wellbeing

All staff understand that they have an important role to play in supporting the mental health and wellbeing of our pupils and are aware that mental health concerns can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide and could also be an indicator that a child has suffered or is at risk of suffering from abuse, neglect or exploitation.

We have clear systems and processes in place for identifying possible mental health concerns, including routes to escalate, and clear referral routes and accountability systems.

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to **observe** children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which we are well placed to recognise. These could include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually like, and physical signs of self-harm or neglecting themselves.

We recognise that not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, we can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital

early intervention. We will ensure that any interventions we offer are evidenced as safe and effective and appropriate for the individual child.

If staff have a concern about a child's mental health that is also a safeguarding concern, they will follow safeguarding policy and speak to the designated safeguarding lead or deputy. If it is felt that the child is in danger, we will call 999 or arrange for the child to be taken to A&E immediately by a parent/carer or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, we will contact and seek support from NHS 111 online or call 111 and select the mental health option.

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff are aware of how these experiences, can impact on their mental health, behaviour, and education.

J Hemmings is our mental health lead. Children's mental health is supported by the wider SLT team and parent/support wellbeing lead.

Guidance and helpful documents: -

- Mental health and behaviour in schools
- Preventing and tackling bullying
- MIND-Parenting Capacity and Mental Health
- NSPCC-Mental Health and Parenting
- Building Suicide-Safer Schools and Colleges | Papyrus
- Guidance for education settings responding to a sudden unexpected death being treated as a suicide

Online Safety (Incl mobile phones and personal devices) (Links for parental support re online safety on pg.176 KCSiE)

The use of technology continues to be a significant component of many safeguarding issues; Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sextortion, sexual predation, and technology often provide the platform to facilitate harm. We realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material.

Staff are aware of the risks posed by **COM Networks (Communication Networks)**, which may use social media, messaging platforms, gaming environments and other online spaces to groom, coerce, exploit or manipulate children. Concerns that a child may be involved with, or targeted by, a COM Network **will** be treated as a safeguarding concern and responded to in accordance with this policy.

We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk (4Cs):

- **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact**: being subjected to harmful online interaction with other users; 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, including those generated using AI and online bullying.
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group.

Consideration of these 4Cs, provide the basis for our Online Safety policy (Please see website)

Online safety is a running and interrelated theme in our setting, whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement.

We recognise that unrestricted access to mobile phones and other personal internet-enabled devices can present safeguarding, wellbeing and educational risks. In line with national guidance, we operate as a mobile phone-free environment during the school day. Pupils do not have access to mobile phones during lessons, between lessons, breaktimes or lunchtimes unless a specific exception has been agreed to meet an identified medical, safeguarding or educational need. Arrangements for the storage, use of and management of mobile phones and other personal devices are set out within our Mobile and Smart Technology Policy and Behaviour Policy. (Please see website)

Staff remain alert to the risks associated with mobile devices, including online bullying, child-on-child abuse, the making or sharing of nudes or

semi-nudes, harmful online content, exploitation and the inappropriate use of social media.

Our filtering and monitoring standards will

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

The Governing body will ensure that a review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

The annual review of filtering and monitoring arrangements will be led by the member of the senior leadership team responsible for filtering and monitoring, with support from the Designated Safeguarding Lead and IT support provider. The review will include checks that filtering and monitoring systems are operating effectively across all internet-connected devices and relevant locations used by pupils and staff.

A record of these checks, any identified concerns and actions taken will be maintained and reviewed as part of the school's safeguarding and governance arrangements. When reviewing filtering and monitoring arrangements, the Governing Body will consider the age range of pupils, the needs of children who may be at greater risk of harm, patterns of access to technology within the setting and the proportionality of safeguarding risks when determining appropriate filtering and monitoring measures.

Education at home/Remote learning: - Where children are being asked to learn online at home, our school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

Online Safety

Our setting recognises that the use of the internet, mobile phones, smart technology and wearable devices, including smart watches and smart glasses, forms an integral part of children and young people's lives. We acknowledge that many learners have access to the internet through personal mobile devices and networks, including while they are on the school/college site.

We are committed to promoting a safe and responsible digital environment and to protecting children and young people from the risks associated with online activity. This includes online

bullying, harassment, sexual harassment, coercive or controlling behaviour, the creation and sharing of nude or semi-nude images, including where this occurs consensually or non-consensually, exposure to pornography, and access to other harmful or inappropriate content.

Our approach to online safety

Online safety is embedded throughout our safeguarding arrangements and is considered an ongoing, interrelated theme across our policies, procedures, curriculum and pastoral provision. We take a whole-setting approach that promotes safe, responsible and respectful use of technology by learners, staff, parents/carers and visitors.

Our approach includes:

- Maintaining a robust **Online Safety Policy** alongside our Safeguarding and Child Protection Policy.
- Maintaining clear expectations regarding the use of mobile phones, smart phones, smart watches, smart glasses and other personal devices.
- Providing age-appropriate education about online safety, digital citizenship, healthy relationships, consent, online bullying, sexual harassment, image sharing, pornography and harmful online content.
- Ensuring staff understand how to recognise, respond to and report online safeguarding concerns.
- Providing clear reporting mechanisms for children and young people to raise concerns about online incidents.
- Identifying, recording, responding to and escalating online safeguarding concerns in accordance with our safeguarding procedures.
- Working with parents/carers to promote safe and responsible use of technology at home and within the wider community.
- Regularly reviewing emerging online risks and adapting our policies, procedures and education accordingly.

Systems and monitoring

We use appropriate technical and organisational measures to safeguard learners and staff when using our digital systems. These include appropriate filtering and monitoring arrangements, secure user accounts and access controls, data protection measures, reporting mechanisms and procedures for responding to online safety incidents.

Online safety concerns identified through our systems, staff observations, disclosures or reports from learners and parents/carers are assessed and managed in accordance with our

safeguarding and behaviour procedures. Where appropriate, concerns are escalated to the Designated Safeguarding Lead (DSL), senior leadership, external agencies or other relevant professionals.

Our filtering, monitoring and security arrangements are reviewed regularly to ensure that they remain effective and reflect emerging risks and developments in technology.

Education and prevention

Online safety education is delivered through the curriculum and wider safeguarding provision. This includes appropriate content through RHSE/RSHE, computing and other relevant curriculum areas, as well as assemblies, workshops, enrichment activities and off-timetable safeguarding days where appropriate.

Learners are supported to understand:

- how to use technology safely and responsibly;
- how to recognise online abuse, bullying, harassment and coercive or controlling behaviour;
- the risks associated with sharing personal information and images;
- the legal, safeguarding and emotional implications of creating, requesting or sharing nude or semi-nude images;
- the risks associated with pornography and other harmful online content;
- how to maintain healthy relationships and demonstrate respect and consent online;
- how and where to report concerns and seek support.

Staff receive appropriate training so that they can recognise online safeguarding risks and respond consistently and effectively.

Links with other policies and procedures

Online safety is considered alongside and within other relevant policies and procedures, including:

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Mobile and Smart Technology Policy
- Acceptable Use/Acceptable Use of Technology Policy
- Staff Code of Conduct

- Behaviour Policy
- Anti-Bullying Policy
- Relationships, Sex and Health Education (RSHE/RHSE) Policy
- Data Protection and Privacy Policy
- ICT/Information Security Policy
- Complaints and Reporting Procedures

These policies are reviewed to ensure that they remain consistent and that online safety is addressed as part of the setting's wider safeguarding framework.

Working with parents and carers

We recognise the important role parents and carers play in keeping children and young people safe online. We provide information, advice and guidance through appropriate channels, including parent information evenings, newsletters, the setting website, social media and signposting to relevant online safety resources.

Parents and carers are encouraged to discuss online safety with their children, establish appropriate boundaries around technology use and report concerns to the setting where appropriate.

Annual review and risk assessment

Our approach to online safety is reviewed at least annually and following any significant incident, safeguarding concern or substantial change in technology or guidance.

The annual review is supported by an online safety risk assessment which considers the current and emerging risks faced by our learners, including risks associated with personal mobile devices, social media, messaging platforms, online gaming, image sharing, pornography, online bullying, sexual harassment, exploitation and harmful content.

The findings of the review and risk assessment inform improvements to our policies, staff training, curriculum provision, technical controls and safeguarding arrangements.

Cyber security

The setting recognises that effective cyber security is an important part of safeguarding learners, staff and the wider school/college community. We maintain appropriate security measures to protect our systems, information and users from cyber threats.

Our cyber security arrangements include appropriate access controls, secure passwords and authentication, software and security updates, backup arrangements, staff awareness and

training, incident reporting and response procedures, and regular review of the effectiveness of our security measures.

We monitor developments in cyber crime and relevant national guidance and will review and strengthen our security arrangements where necessary. We will have regard to relevant **GOV.UK** and **National Cyber Security Centre (NCSC)** guidance, including the cyber security standards for schools and colleges and guidance for school staff, governors and trustees.

The effectiveness of our cyber security and safeguarding arrangements is reviewed periodically to ensure that they remain appropriate to the risks faced by the setting.

Guidance Documents:

- Children's Commissioner-Online Safety
- Teaching online safety in schools
- Appropriate Filtering and Monitoring
- CEOP-Safety Centre
- National Cyber Security Centre
- 360 Degree Safe - Online Safety Review Tool
- UKCCIS-UK Council for Child Internet Safety

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if a child with a disability) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent. People become involved in private fostering for all kinds of reasons.

Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff will notify the DSL/DDSL if they become aware of a private fostering arrangement. There is a mandatory duty that we inform Staffordshire Families Integrated Front Door of a private fostering arrangement who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Documents:

- Fostering in Staffordshire
- Children Act 1989 – Private Fostering

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism, and similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our settings safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

We value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. However, freedom of speech comes with responsibility and that which is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. It is not an unqualified privilege and is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. Our staff are alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement to identify children who might be at risk of radicalisation and act proportionately which may include the DSL/DDSL making a prevent referral.

Prevent Duty

We have a duty to have "due regard to the need to prevent individuals being drawn into terrorism" and this is known as The Prevent Duty and is part of our wider safeguarding obligations.

DSL/DDSL and other senior leaders in our setting are familiar with this Prevent duty guidance especially paragraphs 141-210, which are specifically concerned with education (and covers childcare). There are three general themes: leadership and partnership, capabilities and reducing permissive environments.

The Governors, Head Teacher/Principal and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. We have completed a Prevent duty risk assessment.

Our DSL/DDSL know how to make a Prevent referral using the National Prevent referral form.

We will monitor online activity within our setting to ensure that inappropriate sites are not accessed by students or staff. We have appropriate filtering and monitoring systems in place on our devices and networks, and these are regulated, and risk assessed as part of the prevent duty. (See filtering & monitoring and online safety within this policy. (Securus)

Guidance Documents:

- Prevent duty guidance
- Understanding Martyn's Law
- Educate Against Hate
- ACT Early | Prevent radicalisation

Serious Violence

All staff are aware that serious violence is a continuing safeguarding concern and may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff understand that they play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may be victims themselves).

All staff are alert to signs that a child may be at risk of or involved in serious violence and that these risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending.

All staff are aware of the indicators, which may signal children are at risk from, or are involved in serious violence. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. We will try to be alert to when children might be at highest risk around the school day (for example, immediately after school/college).

Staff understand that they must report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy).

The DSL will assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action, which may include sharing information with multi-agency colleagues in line with KCSiE and Working Together. Depending on the risk, the DSL/DDSL will ensure that a safety and support plan will be put in place, and where relevant, consider action to de-escalate peer conflict. This will include Early evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

The DSL/DDSL will work closely with relevant partners to ensure that they have contextualised knowledge and make appropriate referrals. They will be proactive in sharing relevant information, to the police, using the police intelligence form

Guidance documents:

- Suspension and permanent exclusions
- Serious Violence Strategy - GOV.UK
- An analysis of indicators of serious violence
- Gangs and Youth Violence-Schools & Colleges
- Tackling violence against women& girls strategy
- Violence against women and girls-national statement of expectations
- Youth Endowment Fund
- New Violence Reduction Strategy for Staffordshire

Children with family members in prison

We recognise that children with a parent or family member in prison may be vulnerable and require additional support. Staff will consider the impact of parental imprisonment on a child's wellbeing, attendance, behaviour and educational outcomes and provide support as appropriate.

Children and the court system

We recognise that some children may be required to engage with the criminal or family court system and may require additional support during this process. Staff will work with relevant agencies to safeguard and support children where appropriate.

Child abduction and community safety incidents

Through the curriculum and wider safeguarding arrangements, children are taught about personal safety and how to respond to situations which may place them at risk. Concerns regarding child abduction or community safety incidents will be managed in line with safeguarding procedures.

Appendix 3

Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results the above points
- We are aware the types of behaviours that are indicative of the kind of promotion or advancement relevant to the definition and are an important guide to its application. Definition of Extremism

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.

6. Indicators of vulnerability include:

- Identity Crisis – the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

- Unmet Aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all children experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Family members convicted of a terrorism act or subject to a Channel intervention.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.
- Fascination with extreme violence or mass casualty attacks

Appendix 4

Role of the Staffordshire Local Authority Designated Officer (LADO)

The Staffordshire LADO promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases. They **may** offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO and where the broader goals of a safer children's workforce are relevant.

The service will give **advice** on how concerns or allegations should be investigated, including if a referral should be raised with the Police and/or Children's Social Care. They are not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

They are compliant with the SSCP procedures and Working Together 2026 ensuring that allegations are dealt with consistently and in a timely manner and that a through, proportionate and fair process is followed.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed.

All reports of concern or allegation to the Staffordshire LADO that an adult working or volunteering with children:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she may 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

The Headteacher/Chair of Governors/Proprietor will refer to the LADO in Staffordshire via the LADO Referral form

Further guidance: -

- KCSiE 2026 Part 4
- Working Together to Safeguard Children 2026

Appendix 5

Useful safeguarding contacts

- Staffordshire Education Safeguarding Advice Service (ESAS) on 01785 895836 or email esas@staffordshire.gov.uk
- Local Authority Designated Officer – all referrals via form
- Staffordshire Families Integrated Front Door (SFIFD) 0300 111 8033
- Emergency Duty Services (EDS) 0345 604 2886 or via email eds.team.manager@staffordshire.gov.uk
- Stoke-on-Trent Children's Services: Chat and Advice Service (CHAD) 01782 235100 Emergency Duty Team: 01782 234234
- Staffordshire Police Prevent Team 01785 232054/233109 or email prevent@staffordshire.police.uk
- PHSE Coordinator Natalie McGrath natalie@staffscvys.org.uk
- Child Exploitation and Online Protection Centre CEOP
- NSPCC–24hr Helpline 0808 800 5000/Staffs School contacts rachel.willis@nspcc.org.uk & Matthew.Harding@nspcc.org.uk
- Stop It Now! child sexual abuse helpline
- Women's Aid - 24 Hour Helpline: 0870 2700 123
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. Unicef

National Contacts

- CEOP (Child Exploitation and Online Protection) CEOP Safety Centre
- Professionals Online Safety Helpline–0844 381 4772 Safer Internet Helpline
- Internet Watch Foundation (IWF)–Internet Watch Foundation
- Professionals Online Safety Helpline (POSH) 0344 3814772. Email helpline@saferinternet.org.uk
- Childline – 0800 1111 Childline
- Ofsted – General enquiries: 0300 123 1231
  About Schools: 0300 123 4234
  Concerns: 0300 123 4666
  e-mail: enquiries@ofsted.gov.uk
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) www.educateagainsthate.com