

# Child Protection and Safeguarding Policy Telford and Wrekin



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## 1. Summary and Aims

This policy is one of a series in the school's integrated safeguarding portfolio. The Designated Safeguarding Lead (DSL) works alongside the Safeguarding Governor and Deputy Designated Safeguarding Leads (DDSLs) to ensure that the procedures cited in this policy are followed by all members of the school community, including visitors to the school.

The DDSLs are all fully trained in safeguarding procedures to the same level as the DSL. They support the DSL in responding to safeguarding concerns, including making initial referrals to Children's Social Care, attending a range of safeguarding meetings and supporting vulnerable pupils in school hours. Just like the DSL, their safeguarding responsibilities are clearly outlined in their job descriptions.

Other documents which relate to safeguarding include: Staff Code of Conduct (Behaviour Policy), Safer Recruitment Policy, Allegations against Staff procedure, Children Missing Education procedures, Complaints procedure, Behaviour and Anti-Bullying Policy, Peer on Peer Abuse Policy and Online Safety Policy.

The school's safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, behaviour and welfare of children and learners.

This policy is available on the school website, via a link to the Community Academy Trust website, and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in school.

### Policy Aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice.
- To inform pupil, parents, staff and other stakeholders about our arrangements for safeguarding children.
- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To contribute to the school's safeguarding portfolio.

All child protection matters will be dealt with in line with Telford and Wrekin Safeguarding Partnership (TWSP) and West Midlands Child Protection and Safeguarding Procedures or, if relevant, the safeguarding partnership area in which children reside or of whom they are under the care.

## 2. Safeguarding Legislation and Guidance

**Academies, free schools, independent schools, alternative providers of education** - Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 require proprietors of independent schools (including academies) to have

arrangements to safeguard and promote the welfare of children who are pupils at the school.

- The ***Teachers' Standards 2012*** state that teachers, including headteachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and uphold public trust in the teaching profession as part of their professional duties.
- The statutory guidance ***Working Together to Safeguard Children (DfE 2018)*** covers the legislative requirements and expectations of individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all schools.
- The statutory guidance ***Keeping Children Safe in Education, (DfE 2021)*** is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children.

*Keeping Children Safe in Education (KCSiE), 2021* emphasises how essential it is that everybody working in a school understands their safeguarding responsibilities. All staff and volunteers who work directly with children must read Part One and Annex B of *KCSiE, 2021*. A copy of this document is available from the DSL and can be found on the school website. Any staff member who does not work directly with children must read at least Annex A of *KCSiE, 2021*. The DSL will make a judgment about which staff are required to read and understand Annex A in place of Part One and Annex B.

As required by *KCSiE, 2021*, staff will be assisted in understanding and discharging their roles and responsibilities as set out in the sections of *KCSiE* they are required to read by questions and answers during training and/or quizzes and regular follow up.

- ***What to do if you're worried a child is being abused 2015 - Advice for practitioners*** is non statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action. A copy of this advice is available from the DSL or via [Child abuse concerns: guide for practitioners - Gov.uk](#).

### 3. Safeguarding Information

#### Our approach to safeguarding

Our staff are an important part of the wider safeguarding system for our pupils.

At this school it is everyone's responsibility to safeguard and promote the welfare of children; this includes everyone who comes into contact with children and their families. Everyone will consider, at all times, what is in the best interest for the child and ensure their practice is child-centred.

For the purpose of this policy, safeguarding and promoting the welfare of children<sup>1</sup> is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

No one in the school will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action to ensure children and families receive the right help at the right time.

This school is committed to identifying children who may benefit from early help as soon as a problem emerges. Our staff maintain the attitude of 'it could happen here' where safeguarding is concerned. Staff must always act in children's best interest where they are concerned about a child's welfare.

Our school believes that the safety, welfare and protection of all children is paramount and any delay in reporting concerns is unacceptable. All staff will identify concerns early, provide help for children and prevent concerns from escalating. All staff will adhere to the child protection procedures established by the TWSP.

The Designated Safeguarding Lead's (DSL) role and that of their Deputy DSLs, is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

Staff members know that they must never promise a child to not tell anyone about a report of abuse, as this may not ultimately be in the best interests of the child.

### Staff Training and Induction

All staff (paid or voluntary) will receive a robust induction to help them fully understand the systems for safeguarding. In addition to this policy, staff will be familiar with our Behaviour Policy, Staff Code of Conduct, how to respond to children going missing and the role of the DSL, including their identity and that of their Deputy DSLs. We will provide copies of policies and a copy of at least Part One and Annex B, or Annex A if more appropriate, to all staff at induction.

All staff will receive appropriate safeguarding and child protection training including online safety at induction. This training will be regularly updated at least every three years. All staff will receive appropriate training in managing peer on peer sexual violence and sexual harassment.

All staff will receive regular safeguarding and child protection updates as required, and at least annually, to provide them with the relevant skills and knowledge to safeguard children.

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<sup>1</sup> Children includes everyone under the age of 18.

All staff will be made aware of the following:

- Telford and Wrekin early help process and their role within it;
- The process for making referrals to children's social care and for statutory assessments under the Children's Act 1989 and the role they might be expected to play in such assessments; and
- What to do if a child tells them they are being abused, exploited or neglected.

Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and children's social care. Staff will never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

## Early Help

In our school we believe that any child may benefit from early help and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled or has certain health condition and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family whose circumstances present challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has a family member in prison, or is affected by parental offending;
- has returned home to their family from care;
- is a privately fostered child.
- is at risk of 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage;
- is at risk of being radicalised or exploited;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day;
- is showing early signs of abuse and/or neglect.

## Abuse and neglect



All of our staff members are trained on the indicators of abuse and neglect to help them identify children who may be in need of help or protection. We believe that abuse, neglect and other safeguarding issues are rarely stand-alone events. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, will consider whether children are at risk of abuse or exploitation in situations outside their families.

All staff are aware that technology is a significant component in many safeguarding and well-being issues. We understand children are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online; this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images and the sharing of abusive images and pornography to those who do not wish to receive such content.

## Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 adult men or women or by other children or young people.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

## Physical abuse

Physical abuse is a form of abuse which 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. This used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness.

The fabrication or induction of illness (FII) in children is a relatively rare form of child abuse. Where concerns exist about FII, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed 'a vital piece of information'. This school will adopt the guidance [Safeguarding children in whom illness is fabricated or induced](#) and TWSP FII Best Practice Guidance.

## Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.

### Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside 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. 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 are aware of our school's policy and procedures for dealing with this. (See Peer on Peer Abuse below).

### Neglect

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, for example, as a result of 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 care-givers);
- ensure access to appropriate medical care or treatment.

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

### Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

Please note, the following list of indicators are not designed to be used as a checklist:

### Indicators of potential physical abuse:

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks or burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

### Indicators of potential sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

### Indicators of potential emotional abuse:

- The child consistently describes him/herself in negative ways - as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia;
- Soiling, smearing faeces, enuresis.

### Indicators of potential neglect:

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school;
- The child is left at home alone or with inappropriate carers;
- Adolescent neglect;
- Affluent neglect.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are - they do not need 'absolute proof' that the child is at risk.

## 4. Specific Safeguarding Issues

All staff are trained to identify a range of safeguarding issues that can put children at risk of harm, as outlined below.

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

This school recognises CCE and CSE<sup>2</sup> are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual 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.

The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16 and 17 year olds who can legally give consent to have sex.

Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance, in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- a child travelling outside the area in which she/he lives in order to transport,

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<sup>2</sup> [Child sexual exploitation: guide for practitioners](#)

distribute or sell drugs, or transport money, for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below);

- a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated;
- a child being forced to commit crime in order to settle actual or fabricated debts
- a child being forced to shoplift or pickpocket;
- a child being forced to threaten other young people;
- a child being forced to work in a cannabis factory;
- a child being forced to commit crime in order to settle actual or fabricated debts;
- gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang;
- a child being encouraged or manipulated to commit crime via social media;
- a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- children appearing with money, clothes, mobile phones, etc. without plausible explanation;
- children who associate with other young people involved in exploitation;
- children in relationships with controlling or significantly older individuals or groups;
- children frequenting areas known for sex work and/or criminal activity;
- children who associate with gangs and/or become isolated from their peers/social networks;
- children who present with significant changes in emotional well-being;
- children receiving excessive texts/phone calls;
- multiple callers (unknown adults or peers) to children;
- concerning use of internet or other social media by children;
- increasing secretiveness around children's behaviours;
- children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant;
- children self-harming;
- children arriving at school or returning home under the influence of drugs and/or alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education, have unexplained absences or do not take part in education;
- children being exposed to or perpetrating serious levels of violence and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them;<sup>3</sup>
- evidence of/suspicions of children suffering physical or sexual assault.

Although the following vulnerabilities increase the risk of child sexual exploitation and/or criminal exploitation, it must be remembered that not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

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<sup>3</sup> For further information see [Preventing youth violence and gang involvement - DfE, March 2015](#)

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually and/or criminally exploited;
- Family members or other connections involved in adult sex work and/or other criminal activity;
- Having a physical or learning disability; and
- Being looked after (particularly those in residential care and those with interrupted care histories);
- Issues/anxieties about sexual identity.

The school teaches children about consent and the risks of sexual and criminal exploitation in the PSHE and SRE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

If we feel that children may be being abused through exploitation, we will consult in the normal way with the relevant local authority social care team to seek advice. In Telford & Wrekin we will consider whether the incident follows a [CSE care and support Pathway](#). The concerns will be followed through sensitively and appropriately with fellow professionals and the [CSE referral form](#) will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around a child attending our setting, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the TWSP [A guide for professionals CATE leaflet](#). Due to the high number of reports in our borough, we will be particularly alert to the CSE and CCE.

We will make parents and carers, and children and young people aware of the relevant TWSP [CATE leaflets](#). We will provide them with information on [CEOP](#) the Child Exploitation and Online Protection command. Children and adults can use CEOP to report if they are concerned that a child is being sexually abused or groomed online.

### ‘County Lines’

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. 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.



Children can be targeted and recruited into county lines in a number of locations including our setting, other education settings, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children 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 CSE and CCE 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 and are subsequently found in areas away from their home;
- have been the victim or 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.

We will make the [Home Office](#) guidance on the signs of a child's involvement in county lines available to staff.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation, such as [CLIMB](#).

### **Modern Slavery and the National Referral Mechanism (NRM)**

Staff understand that Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

We know that information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#).

### **Mental Health**

At this school all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will be made aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the DSL/DDSL and recording concerns.

We will follow the DfE guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools.

### Peer on peer/Child on child abuse<sup>4</sup>

At this school all staff are trained to understand that children can abuse other children. We refer to this as peer-on-peer abuse. It can happen both inside and outside of school and be face-to-face or online.

All staff are expected to challenge inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable 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.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including online, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm<sup>5</sup>;
- sexual violence, such as rape, assault by penetration and sexual assault<sup>6</sup>;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, a criminal offence, 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. Anyone of any gender can be a victim;

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<sup>5</sup> This may include an element of online abuse which facilitates, threatens and/or encourages physical abuse

<sup>6</sup> As above

- initiation/hazing-type violence and rituals - used to induct newcomers into an organisation such as a sports team or a school group by subjecting them to a series of potentially humiliating, embarrassing or abusive trials which promote a bond between them.

This school actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- educating all governors, staff, strategic leaders, pupils and parents about this issue;
- educating children about the nature and prevalence of peer-on-peer abuse, positive, responsible and safe use of social media and the unequivocal facts about consent, via the curriculum;
- engaging parents on these issues;
- supporting the ongoing welfare of children and young adults by drawing on multiple resources that prioritise their mental health, and by providing in-school counselling and therapy to address underlying mental health needs;
- working with governors, school leaders and all staff, pupils and parents to address equality issues, to promote positive values and to encourage a culture of tolerance and respect amongst all members of the school community;
- creating a whole-school culture through which our pupils can appreciate safe and healthy relationships;
- responding to cases of peer-on-peer abuse promptly and appropriately, and
- ensuring that all peer-on-peer abuse issues are fed back to the DSL and deputies so that they can spot and address any concerning trends and identify students who may be in need of additional support.

This school actively engages with TWSP in relation to peer-on-peer abuse, and works closely with, for example, children's social care, the police and other schools. The relationships the school has built with these partners are essential to ensuring that the school is able to prevent, identify early, and appropriately handle cases of peer-on-peer abuse. The DSL (or deputy) will regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

This school recognises that any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. We know that research suggests:

- peer-on-peer abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously;
- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and
- some children may be more likely to experience peer-on-peer abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

## Sexual violence or sexual harassment between children

Sexual violence and sexual harassment can occur between children of any age and sex and

between children of the opposite or the same sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As with all other safeguarding issues, staff are trained and expected to maintain an attitude of 'It could happen here' in relation to the possibility of sexual violence and sexual harassment happening in the school. It is important that **all** victims of sexual violence or sexual harassment are taken seriously and offered appropriate support and any report of sexual violence or sexual harassment will also be taken seriously; staff are trained to be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attend(s) the same school. Safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships, child sexual exploitation and child criminal exploitation.

It is essential that all victims are reassured they are being taken seriously and that they will be supported and kept safe. Staff should never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The school will respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online. This policy largely refers to sexual violence and sexual harassment between pupils at this school. However, there may be occasions when pupils report sexual violence and/or harassment perpetrated by other young people who attend a different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator's school as well as the victim's parents, the Police and Children's Social Care. Support for the victim will be provided, irrespective of which educational provision the alleged perpetrator attends.

The school recognises the importance of staff understanding the nature of, and identifying and challenging, sexual violence and sexual harassment as part of the school's wider approach to safeguarding and promoting the welfare of children.

Staff are aware that some groups are potentially more at risk and particularly girls, children with SEND and LGBT children.

We will ensure that staff are aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment; and,

- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

For the purpose of this policy, we use the term ‘victim’, ‘alleged perpetrator(s)’ or where appropriate ‘perpetrator(s)’. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

Along with providing support to children who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. We recognise that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our setting. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

We understand that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We also know it is also important that other children and our staff are supported and protected as appropriate.

We will try to be aware of, and respond appropriately to **all reports and concerns**, including those outside of our setting, and/or online.

## Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way both inside and outside of our setting. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Causing someone to engage in sexual activity with consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

## Consent

We believe that **consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

All of our staff understand that:

- child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

## Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline both inside and outside of our setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone or part of a wider pattern of sexual harassment and/or sexual violence;
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos.

We will follow the guidance set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

## Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Please refer to our policy and procedures with regard to peer-on-peer abuse.

## Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. We use the term "harmful sexual behaviour" (HSB). **HSB can occur online and/or face to face and can also occur simultaneously between the two.** We will consider HSB in a child protection context.

We will follow the specialist support and advice on HSB available from the specialist sexual violence sector. Our DSL will undertake training in HSB and incorporate this into our approach to managing sexual violence and sexual harassment.

Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We understand it is important that they are offered appropriate support.

## Our approach to preventing peer on peer on abuse, including child on child sexual violence and sexual harassment

We will undertake pre-planning, training for staff and implement an effective peer-on-peer abuse policy to help us develop the foundation for a calm, considered and appropriate response to any reports.

**We understand the best responses to peer-on-peer abuse** are based on a whole setting approach to safeguarding and child protection and we will involve our whole community in this. All staff in our setting will undertake training in how to respond to peer-on-peer abuse, including reports of sexual violence or sexual harassment.

Systems are in place which are well promoted throughout our setting and understandable and accessible for our pupils to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

We accept the most effective preventative education programme will be through a whole setting approach that prepares pupils for life in modern Britain. Our setting has a clear set of values and standards, and these are upheld and demonstrated throughout all aspects of school life. This is underpinned by our behaviour policy and pastoral support system, and by our planned programme of evidence-based content, delivered through the curriculum. Our programme is developed to be age and stage of development appropriate. The DSL will support teachers in their delivery of this part of our curriculum. We recognise good practice allows children an open forum to talk through things and that such discussions can lead to increased safeguarding reports. Children will be made aware of the processes to raise their concerns or make a report and how any report will be handled. This will include processes

when they have a concern about a friend or peer. All staff are aware of how to support children and how to manage a safeguarding report from a child.

The DSL will consider if external support or intervention is necessary as part of our approach to sexual violence and sexual harassment. We recognise specialist organisations can offer a different perspective and expert knowledge.

## **Our response to peer-on-peer abuse, including reports of sexual violence or sexual harassment**

The school will work to safeguard pupils from sexual violence and sexual harassment and will respond to reports of specific incidents in accordance with Part 5 of *KCSiE 2021* and the DfE advice to schools: [\*Sexual violence and sexual harassment between children in schools and colleges\*](#). (September 2021)

It is our aim to always recognise, acknowledge and understand the scale of harassment and abuse. We aim to never downplay some behaviours related to abuse that can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it and not coming forward to report it.

Where necessary we will work with other professionals, agencies and partners in our response. This may include the TWSP partners, the relevant local authority children's social care departments, the police, the NSPCC, the Anti-Bullying Alliance and online services, such as The UK Safer Internet Centre, Internet Watch Foundation and Thinkuknow.

We recognise that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react. In some cases, the victim may not make a direct report.

### **The immediate response to a report**

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL (or deputy) without delay.

We will reassure **all** victims 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 our setting will not be downplayed and will be treated equally seriously. We will never give a victim the impression that they are creating a problem by reporting peer on peer abuse, including sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report.

### **Risk assessment**

All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using their professional judgement and supported by other agencies, such as Children's Social Care and the Police. The need for a



risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator/s (if she/he/they attend the same school); and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms.

Risk assessments must be recorded (written or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all of our pupils and students and put adequate measures in place to protect them and keep them safe.

The DSL (or a deputy) will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Our risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform our approach to supporting and protecting our pupils and students and updating our own risk assessment.

The DSL may use and consider the [TWSP Sexually harmful behaviour - risk assessment tool](#).

### Action following a report of peer-on-peer abuse, including sexual violence and/or sexual harassment

Our DSL (and deputies) have a complete safeguarding picture and they are the most appropriate people to advise on our initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;



- are there ongoing risks to the victim, other children or staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

The starting point regarding any report will always be that there is a zero -olerance approach to sexual violence and sexual harassment; it is never acceptable and it will not be tolerated.

As a matter of effective safeguarding practice, we will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, especially where a case is progressing through the criminal justice system.

### Managing the report

When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not stop us taking immediate action to safeguard our children, where required.

We will regularly review our decisions and actions, consider our relevant policies and any lessons learnt. We will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given to whether there are wider cultural issues within our setting that enabled the inappropriate behaviour to occur and where appropriate, extra teaching time and/or staff training may be delivered to minimise the risk of it happening again.

The DSL/DDSL will use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL/DDSL may consult with Family Connect, and/or other relevant agencies on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL/DDSL considers or suspects that the alleged behaviour in question might be abusive or violent or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL/DDSL will contact Family Connect or the local social care team for the child and/or the police immediately and, in any event, within 24 hours of the DSL or deputy becoming aware of the alleged behaviour. The DSL/DDSL will discuss the concerns or allegations with the agency and agree on a course of action, which may include:

- managing internally;

- early help;
- referral to children’s social care; and
- reporting to the police.

All concerns, discussions, decisions and reasons for decisions will be recorded using the school’s recording system.

If bail conditions are in place, we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within our setting.

There may be delays in any case that is being progressed through the criminal justice system. We will not wait for the outcome - or even the start - of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school. The DSL/DDSL will work closely with the police and other agencies as required, to ensure any actions we take do not jeopardise the police investigation.

If a child is convicted or receives a caution for a sexual offence, we will update our risk assessment. We understand it is important that we ensure both the victim and alleged perpetrator(s) remain protected. Where cases are classified as “no further action” by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator(s).

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Family Connect or the relevant children’s social care team may be appropriate. If a report is shown to be deliberately invented or malicious, disciplinary action against the individual concerned will be considered in line with our behaviour policy.

### **Ongoing response to peer-on-peer abuse, including sexual violence or sexual harassment**

We will consider the principles based on effective safeguarding practice and to help shape any decisions regarding safeguarding and supporting the victim and the alleged perpetrator(s).

Victims may not talk about the whole picture immediately. It is essential that dialogue is kept open and encouraged. We will offer victims a designated trusted adult in our setting to talk about their needs.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. We will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This will be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

Whilst we will give all the necessary support to victims to remain in our setting, if the trauma results in the victim being unable to do this, alternative provision or a move to another setting will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim (and following discussion with their parents or carers).

Please refer to our policy and procedures with regard to peer-on-peer abuse.

### Serious violence

All staff are aware of the indicators, which may signal that children are at risk from, or are involved in, serious violent crime. 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware of the associated risks and understand the measures in place to manage these. We will follow the advice provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

We recognise to help prevent violence in our school this can require a mix of universal, targeted or specialist interventions. Our school leaders will aim to:

- develop skills and knowledge to resolve conflict as part of the curriculum;
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour;
- understand risks for specific groups, including those that are gender-based, and target interventions;
- safeguard, and specifically organise child protection, when needed;
- carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision; and
- work with local partners to prevent anti-social behaviour or crime.

In order to tackle violence affecting our setting and the community, we know it is important to:

- understand the problems that young people are facing both in our setting and in their local community;
- consider possible avenues of support; and
- work with local partners (who may have valuable information, resources or expertise).

Working with the local community safety partnership, the youth offending team and the neighbourhood police team will help us to achieve a full understanding of the context in which we are working. As part of our emergency management planning, we have in place systems for targeting and responding to individual or group violence. Even if violent incidents

themselves do not appear to be an immediate concern, there may be a need to build resilience to such problems for the future.

Evidence shows that early-stage intervention is an effective strategy for preventing children becoming involved in violence, crime or antisocial behaviour later in life. We will assess what will work best in preventing violence in our school to decide who to involve in providing intervention.

### Child abduction and community safety incidents

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

We know that other community safety incidents in the vicinity of our school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) we will give them practical advice on how to keep themselves safe. This may include outdoor-safety lessons run by teachers or other professionals. We will aim to build children's confidence and abilities rather than simply warning them about all strangers.

### Children and the court system

This school recognises that sometimes children are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will follow the age appropriate guides to support children 5-11 year-olds and 12-17 year-olds. This will ensure that the correct process is followed and that support and special measures are made available.

We understand that child arrangements made via the family courts following separation can entrench conflict in families and can be stressful for children. We follow the guidance of the Ministry of Justice to help manage these situations.

### Children Missing from Education (CME)

Where children have gone missing we will follow the [West Mercia Pathway for Children who go Missing from Home, Care or Education](#).

All staff members are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, including sexual abuse or exploitation and child criminal exploitation, which may involve 'county lines'. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based

abuse or risk of forced marriage. We will use early help strategies, if necessary, to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in the future.

As part of induction and annual training, staff will be made aware of the school's unauthorised absence and children missing from education procedures.

### Elective Home Education (EHE)

We understand that many home-educated children have an overwhelmingly positive learning experience. However, we know this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

We will follow the Telford & Wrekin Council, EHE policy and inform Telford & Wrekin Council of all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will facilitate a meeting with the local authority education team, ourselves, other relevant schools, other key professionals and, where possible, parents/carers. Ideally, this will be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will invite the local authority education team by emailing [accessandinclusion@telford.gov.uk](mailto:accessandinclusion@telford.gov.uk).

We understand it is our responsibility to identify the parents or carers with whom we need to meet to discuss EHE before they make their final decision. We will record if parents refuse to attend this meeting.

### Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The school will seek to support pupils in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate. We will use the information from NICCO, to help mitigate negative consequences for those children.

### Cybercrime

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

If there are concerns about a child in this area, the DSL/DDSL, will consider referring into the **Cyber Choices** programme.

### Domestic abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been, married to each other or civil partners; have agreed to marry or become civil partners; have been in an intimate relationship with each other; have shared parental responsibility for the same child; or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse and they are related to the abusive person. The definition can be found here: [www.legislation.gov.uk](http://www.legislation.gov.uk).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. 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.

Many children witness and are adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'.

Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child-safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. We will always liaise with agencies in a two-way process where domestic abuse and/or violence is a factor in a household. Children within our care will be appropriately supported. We are part of the Operation ENCOMPASS process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and/or impact on children’s development.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

We will use the following additional advice on identifying children who are affected by domestic abuse and how they can be helped:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [SafeLives: young people and domestic abuse](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#)
- [Home : Operation Encompass](#)

## Homelessness

This school understands that being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The DSL/DDSLs are aware of how to contact and refer concerns to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness 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 should be progressed as appropriate, this does not, and will not, replace a referral into Children’s Social Care where a child has been harmed or is at risk of harm.

<sup>7</sup>In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases, 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children’s services will be the lead

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<sup>7</sup> Post 16 provision only



agency for these young people and the DSL /DDSL will ensure appropriate referrals are made based on the child's circumstances. In these cases we will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the [provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation](#).

### **So-called 'honour-based' abuse, including Female Genital Mutilation and Forced Marriage**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include 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. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take.

The school recognises all forms of HBA, regardless of the motivation, as abuse and safeguarding concerns and staff will handle and escalate as such. We will be alert to the possibility of a child being at risk of, or already having suffered, HBA.

Any concerns about a child who might suffered, or be at risk of, HBV will be reported to the DSL or a Deputy DSL as with any other safeguarding concern. As appropriate, they will activate the local safeguarding procedures by contacting Family Connect/local social care team for the child and if necessary, the police. The DSL may also contact the Forced Marriage Unit on 020 7008 0151 or via email at [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk) for advice as necessary.

### **Female Genital Mutilation (FGM)**

Female Genital Mutilation is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years' imprisonment or a fine, or both.

As a school we will follow the National FGM Centre [Female Genital Mutilation: Guidance for schools](#).



## FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) 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 through 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 will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, 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. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with our DSL or deputy and involve children’s social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (i.e. where the teacher does not discover that an act of 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, teachers will follow our local safeguarding procedures and report to Family Connect or the local social care team for the child. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

In respect of FGM we will adopt the local [FGM Practice Guidelines and Resource Pack](#) as part of safeguarding responsibilities and inform/educate our staff in this particular area.

## Forced Marriage

This school understands that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into 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 into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We play an important role in safeguarding children from forced marriage.

We will follow the Forced Marriage Unit published [statutory guidance](#) and [Multi-agency guidelines](#). Our staff can contact the Forced Marriage Unit if they need advice or information on: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

## Preventing Radicalisation

As a school we understand children are vulnerable to extremist ideology and radicalisation. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our 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. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 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 accept that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

This school understands that it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training, staff will be 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 in identifying children who might be at risk of radicalisation and act proportionately. This includes reporting their concerns to the DSL/DDSL who will consider making a Prevent referral to the Channel programme.

## The Prevent Duty

This school is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as The Prevent Duty.

We see The Prevent Duty as part of our wider safeguarding obligation. The DSL, DDSLs and other strategic leaders are familiar with the revised Prevent Duty guidance for England and Wales, especially paragraphs 57-76.<sup>8</sup>

We follow the published advice for schools on the Prevent duty and ensure all staff access regular training on The Prevent Duty.

## Channel

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<sup>8</sup> Post 16 schools will follow the additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#).

This school recognises Channel as a voluntary and confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so and will attend and engage with the Channel panel to assist in any assessment. We will follow the [Channel guidance](#).

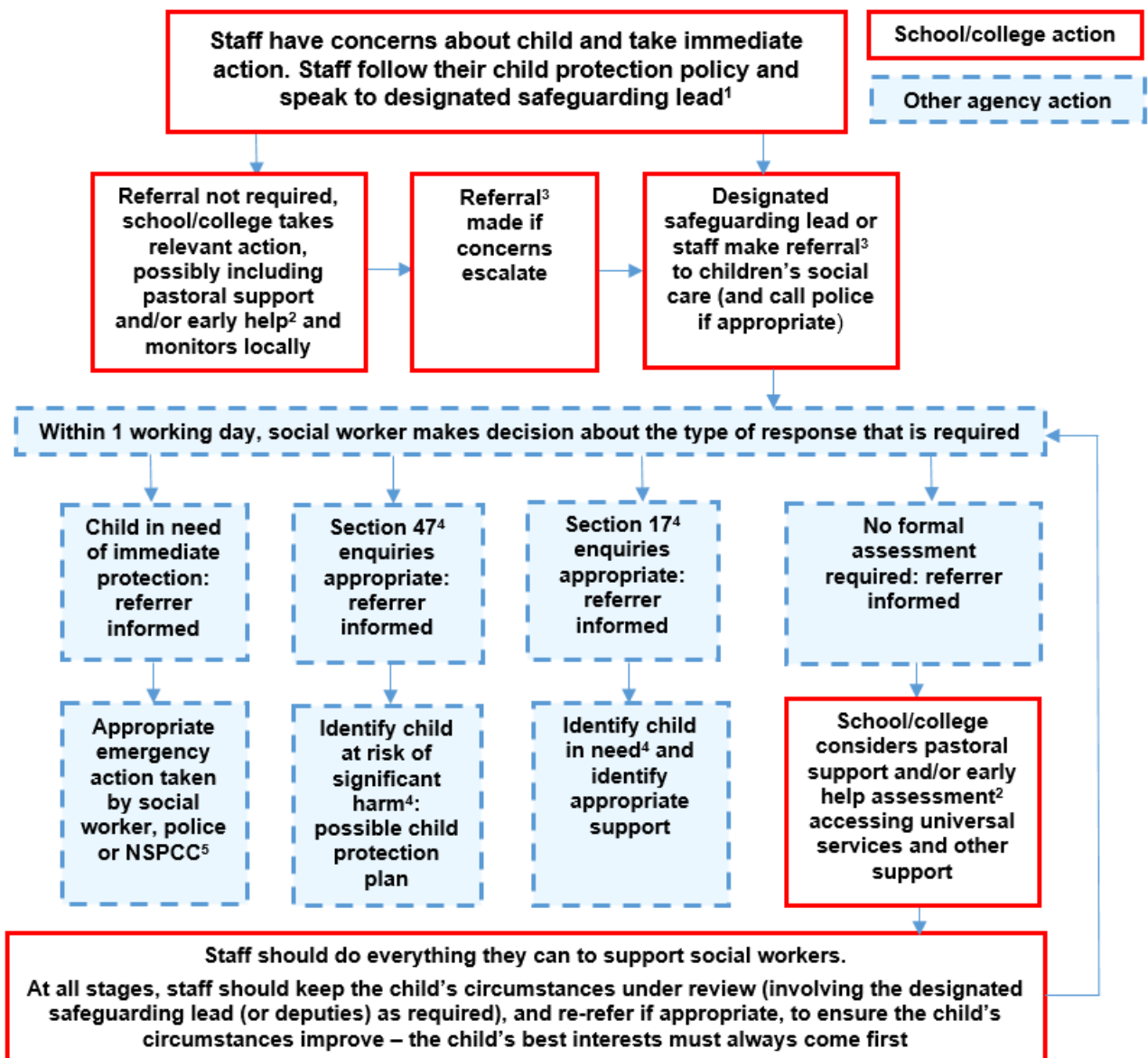
If we feel children are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU) This is done with a This is done with a [Prevent referral form](#), following the Prevent flowchart (Appendix 2). The referral will be sent to the police. The PREVENT referral will be sent to Family Connect or the local social care team for the child and the police. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha**, [jas.bedesha@telford.gov.uk](mailto:jas.bedesha@telford.gov.uk). The education lead for Telford & Wrekin Council is **Scott Thomas-White**, [scott.thomaswhite@telford.gov.uk](mailto:scott.thomaswhite@telford.gov.uk). Where necessary, the DSL (or deputy) will consult with the Telford and Wrekin professional lead, education lead or CTU officer: Alison Potts, [a.potts@west-midlands.pnn.police.uk](mailto:a.potts@west-midlands.pnn.police.uk), 07391019552, to seek advice on making prevent referrals.

## 5. Our Response to Safeguarding Concerns

### What to do if you have concerns about a child

Our staff maintain the attitude of ‘It could happen here’ where safeguarding is concerned and will always act in the best interests of the child.

If staff have any concerns about the welfare of a child, they must act on them immediately. The chart below sets out the process for staff to follow when they have concerns:



When someone has a concern about a child's welfare they should speak to the DSL or DDSL, who will decide what to do next. Options include:

- managing any support for the child internally via the school's own pastoral support processes;

- undertaking an early help assessment;
- making a referral for statutory services, for example, as the child is in need or suffering, or likely to suffer, significant harm. This will involve contacting Family Connect or the local social care team for the child.

NPCC- When to call the police will be considered by the DSL to help them understand when they should consider calling the police and what to expect when they do.

All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the Request for service form.

If in exceptional circumstances, the DSL or a deputy is not available, the person who has the concern should speak to a member of SLT and/or take advice from Family Connect or the local social care team for the child. In these circumstances, any action taken should be shared with the DSL/DDSL as soon as is practically possible.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. If in any doubt about sharing information, staff should speak to the DSL or DDSL.

## Referral agencies

<b>Telford &amp; Wrekin social care team</b>	<b>Shropshire social care team</b>	<b>Staffordshire social care team</b>	<b>Wolverhampton social care team</b>
<b>Family Connect</b> 01952 385385 Out of Hours 01952 676500	<b>First Point of Contact</b> 0345 678 9021 Out of Hours 0345 6789040	<b>Children's Advice &amp; Support Team</b> 0800 1313 126 Out of Hours 0345 604 2886	<b>Safeguarding Service</b> 01902 555392 Out of Hours 01902 552999
<b>If you think a child is in immediate danger, call the police on 999</b>			
Childline 0800 1111	NSPCC 0800 800 5000	Protecting Vulnerable People (West Mercia Police): 101	

## Immediate response to a child or parent

Staff will follow effective safeguarding practice which includes:

- if possible, managing disclosures with two members of staff present, (preferably one of them being the DSL or a deputy). However, this might not always be possible;

- where the disclosure includes an online element, we will be aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and to whom the report will be passed;
- recognising a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust; they should be supportive and respectful of the child;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions - where, when, what, etc. or TED 'tell me', 'explain to me' and 'describe'. It is important to note that whilst leading questions should be avoided, staff may ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the disclosure and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the DSL or DDSL, as soon as practically possible, if the DSL/DDSL is not involved in the initial report.

If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

We will never allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of children. We expect concerns that arise in a morning to be reported to the DSL/DDSL by lunchtime that day at the very latest. Concerns that arise in an afternoon should be reported by, or as close as possible to, the end of the school day. Any concerns arising outside of the normal school day should be reported as quickly as possible. If in doubt, concerned parties should talk with the DSL or a DDSL. **Delay is unacceptable.**

Where a child is suffering, or is likely to suffer from harm, we will make a referral to children's social care (and if appropriate, the police) immediately. If we are unsure in which local authority the child lives we will use the online tool [Report Child Abuse to Your Local Council](#) to direct us to the relevant local children's social care contact number.

Children's social care assessments should consider where children are being harmed in contexts outside the home. Therefore, we will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The school's role is to refer with the information received and **under no circumstances** become the investigator.

We will work appropriately with each child, their family and other agencies to ensure the welfare of the child. We will work in partnership with, fulfil the ethos and abide by the principles of the Telford and Wrekin threshold guidance or the threshold guidance for the local social care team for the child.

Staff within this school may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Staff within this school will also be made aware of the process for making referrals to children's social care and statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

A **child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a **child is suffering, or is likely to suffer, significant harm**. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

Where there are visible injuries all staff should record these on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.



Under no circumstances will staff photograph injuries seen on children as our staff are not expert witnesses. If the concern is around non-accidental injury then that is a matter that requires immediate attention on the day, resulting in an appropriate referral to Family Connect or the local social care team for the child. Those professionals will control the process of photographic evidence gathering underway and assessment.

For staff to interpret any concerns this school will assess each incident as it appears. In respect of assessing any bruising to a child we will refer to the Bruising of Children guidance produced by the TWSP to assist in decision making.

### The role of the local authority

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

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
- further specialist assessments are required to help the local authority to decide what further action to take.

The referrer, even if they are not the DSL or Deputy, will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, the school will consider following TWSP local escalation procedures or those of the safeguarding partnership for the child to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

The Telford and Wrekin Council Director of Children's Services is Jo Britton.

### Record keeping

The school will maintain safeguarding (including early help) and child protection records in accordance with the guidance document *Child Protection Record Keeping Guidance*.

All concerns, discussions and decisions made, and the reasons for those decisions are recorded in writing using the school's recording system.

We keep concerns and referrals separate from the child's main school file. Records include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;



- a note of any actions taken, decisions reached and the outcome.

If in doubt about recording requirements, staff will discuss with DSL/DDSL.

The following recording principles should be adhered to:

- record the date, time, place and context of disclosure or concern, recording facts and not assumptions, supposition or interpretation, and who you shared them;
- record where you spoke with the child or parent and personal safety details, such as 'I discussed the incident with the child in the headteacher's office with the door open' or justify if it was closed. If alone, explain that rationale by, for example, commenting, 'The child stated they would only confide in me if I was alone';
- if it is observation of bruising or an injury try to record detail, e.g. 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg';
- note the non-verbal behaviour and the key words in the language used by the child or parent (try not to translate into 'proper terms' ensuring that you use the child or parent's own words). Body language should be noted and support any record of disclosure;
- it is important to retain on file signed original handwritten notes and pass them on to the DSL or a Deputy DSL who may ask you to complete a written referral to children's social care.

This school has adopted guidance from TWSP Workbook for Designated Safeguarding Leads and Governors with responsibility for safeguarding, incorporating: Advice note on Child Protection record keeping.

We ensure written notes of concerns are made and these are stored chronologically in a safeguarding file/electronically for that child.

All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMS<sup>9</sup>, or a similar package, where used. It should not be presumed that concerns logged by staff electronically have been seen immediately. Ideally, a verbal conversation should also take place as soon as possible, ensuring absolute clarity regarding the concerns expressed.

### **What to do if you have safeguarding concerns about another staff member who may pose a risk of harm to children**

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

- this should be referred to the Headteacher; or
- where there are concerns/allegations about the Headteacher, this should be referred to the chair of the School Standards Committee ;

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<sup>9</sup> CPOMS (Child Protection Online Management System) is one of a number of secure electronic record keeping systems available. Where used, a restricted number of named staff will have full access to the system.

- in the event of concerns/allegations about the Headteacher this may be reported directly to the designated officer(s) at the local authority (LADO).

Any concerns including allegations that may meet the harms threshold will be addressed as set out in Part four Section one of *KCSiE, 2021*. Any concerns that do not meet the harm threshold, referred to, as ‘low level concerns’ will be addressed as in Part four, Section two of *KCSiE, 2021*. When an allegation is made, the DSL will be responsible for ensuring that a child is not at risk and refer cases of suspected abuse to Family Connect or the child’s local social care team.

We will **only** undertake basic enquiries to help determine whether there is any foundation to the allegation.

The LADO for Telford and Wrekin is **Tutsi Selvey**, will be informed of all allegations that come to our attention and appear to meet the criteria set out in Part four Section one of *KCSiE, 2021*, so that she can consult police and children’s social care, as appropriate. All LADO referrals must be made via Family Connect.

We will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

We believe that those who work within our community are in positions of trust and as such our Code of Conduct is based on the underlying principle that the highest standards are expected from all. In line with *KCSiE, 2021*, a separate Code of Conduct is in place for staff, volunteers, contractors and governors in this school.

Guidance for safer working practice for those working with children and young people in educational settings produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all who work with children. We will make our school community aware of its existence and this will work alongside the Code of Conduct mentioned above and other established human resources processes.

To help avoid potential allegations and safeguarding concerns and for the safety and welfare of pupils and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example, for the teaching of drama; in these cases the Headteacher will make a judgement on a case by case basis being appropriate, balanced and proportionate.

### **What to do if you are concerned about another’s safeguarding practice in the school**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our school’s safeguarding regime and know that such concerns will be taken seriously by our strategic leadership team.

As a CAT school, any concerns should be raised in accordance with our CAT Whistleblowing Policy.

Where staff feel that they cannot report a concern through the above channels, general guidance can be found at [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 6. The Management of Safeguarding

The school has a designated governor with responsibility for safeguarding. This governor has a strategic leadership responsibility for our safeguarding arrangements and must ensure that we comply with safeguarding legislation. They must have regard to *KCSiE 2021*, ensuring our policies procedures and training are effective and comply with the law at all times. They have attended TWSP safeguarding governor training. All governors complete child protection and safeguarding training.

The Headteacher ensures that the policies and procedures adopted by the SSC and the Trust Board of Directors are understood and followed by all staff.

### Our approach to safeguarding

This SSC will ensure that we facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and our policy development. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart.

Where there is a safeguarding concern, our SSC and our SLT will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

We will facilitate staff to contribute to and shape our safeguarding arrangements and Child Protection policy.

### Policies and Procedures

We aim to ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

### Missing from education

The recognised figure for persistent absence is being less than 90%, although concerns may still be raised if above this. We will comply with the statutory guidance Children Missing

Education. In respect of this and at a local level, we will require the behaviour and attendance lead to refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying pupils who are missing out on education and policies and procedures for pupils on a modified timetable (available from Telford & Wrekin Council, Access & Inclusion Team). In addition to the above and where reasonably possible we will endeavour to hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a child is missing education and poses a potential welfare/safeguarding concern. Where a child on a Child Protection Plan has been missing from school for two consecutive days we will notify the child's allocated social worker.

Where children leave the classroom or leave our grounds without permission, this is covered within our Behaviour Policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a child without parental responsibility may do what is "reasonable" in all the circumstances to safeguard and promote the child's welfare. It is likely to be "reasonable" to inform the police, or children's services departments, and, if appropriate, their parents, of the child's safety and whereabouts'. However, in principle, if a pupil runs out of class we will establish where he or she has gone. Staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any child who has taken themselves out of our building and possibly out of our grounds, unless this watchful eye provokes the child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the premises, we will contact parents in the first instance. If they are not contactable, we will inform the police that a pupil has left and is at risk.

### The Designated Safeguarding Lead (DSL)

All schools are required to appoint a member of the strategic leadership team to take ultimate responsibility for safeguarding and child protection. This member of SLT, the DSL, co-ordinates all child protection arrangements, including online safety. The DSL and all DDSLs will fulfil their role as set out in Annex C of *KCSiE, 2021*. Their safeguarding responsibilities are detailed in their job descriptions.<sup>10</sup>

The DSL and DDSLs will liaise with TWSP and work with other agencies in line with *Working Together to Safeguard Children, 2018*. Information regarding key personnel can be found in Appendix 3.

During term time, in school hours, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns with. During out of hours/out of term time appropriate cover is provided by ensuring the DSL or DDSL is available. Where safeguarding concerns are raised during an educational visit the DSL/DDSL must be notified immediately, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

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<sup>10</sup> A more detailed outline of the role of the DSL can be found in Appendix 1

The DSL and any deputies will undergo two-day ‘newly appointed designated safeguarding lead’ training as recognised by TWSP to provide them with the knowledge and skills required to carry out the role. They will attend one day DSL refresher training as recognised by TWSP every two years. In addition to their formal training as set out above, their knowledge and skills will be updated, for example, via Telford & Wrekin Council’s Education Safeguarding e-bulletins, attending termly DSL refreshers and taking time to read and digest safeguarding developments, at regular intervals, and at least annually, to keep up with any developments relevant to their role. We aim to ensure at least one DSL or DDSL attends each termly update. Training will then be disseminated to all relevant staff and governors, as appropriate.

The DSL will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council, Education Safeguarding Team. They will complete the Safeguarding Audit - Education each year and submit to TWSP. The Safeguarding Audit - Education, will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

### Multi-agency working

The DSL/DSL will work with other agencies in line with *Working Together to Safeguard Children*, 2018.

Our School Standards Committee (SSC) and the DSL are familiar with the TWSP arrangements. In Telford and Wrekin schools and colleges have been named as ‘relevant agencies’ by TWSP. We will engage with the TWSP as required and will follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the child resides or for who is responsible for the child, to follow the local protocol for assessments.

The SSC expect staff to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will always contribute to inter-agency plans to provide additional support to children subject to child protection plans and will never restrict access for children’s social care to conduct a section 17 or section 47 assessment.

### Information sharing

We recognise that information is vital in identifying and tackling all forms of abuse and neglect and in promoting children’s welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

We expect all staff to share information with practitioners and local agencies. We are committed to 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.

The total security of child protection records is the responsibility of the DSL. All child protection records are clearly marked as such and are kept securely. Procedures are in place

when a member of staff leaves the setting or is on long term sick leave for their access to cease. Removal of child protection records from the school by staff will be noted and signed for, as will files released to professionals.

The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidentially in line with the Data Protection: toolkit for schools.

In respect of files being released when requested by the Police under Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)d)' should accompany that release and a copy will be retained for our records. We will also adopt the Information sharing advice for safeguarding practitioners. If in any doubt, we will also seek advice from our **Data Protection Officer**. Upon releasing records, the school will request ID Badges prior to handover. If the Police are only after minimal data e.g. address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A permission form may not be required on these occasions.

No named statistics in relation to child protection are an important part of performance information. These may be shared by the DSL with staff, the SSC, the Academy Trust or other agencies.

In our management of information sharing we will use the following:

- Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing;
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful;
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department, and
- Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

When a child leaves the school, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible (within five working days of the child starting at their new school or college), ensuring secure transit, and confirmation of receipt will be obtained. We will transfer the child protection file separately from the main pupil file. As a receiving school we will ensure key staff such as the DSL and SENCO are aware, as required. In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. If we are the current host school we will **not** photocopy and retain child protection records as this is deemed by the Information Commissioners Office to contravene The Data Protection Act



2018, but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for ourselves for audit purposes; this would be deemed as best practice.

All child protection records are reviewed annually by the DSL/DDSL. They are checked to be chronological, tidy, legible and factual in content. This should be undertaken at least annually, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings these should include attendance figures.

We will not allow fears about information sharing to stand in the way of the need to safeguard and promote the welfare of children.

We will follow the guidance on the child protection file set out in Annex C of *KCSiE*, 2021.

### Opportunities to teach safeguarding

We teach safeguarding, including online safety to all pupils, endeavouring to provide a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children. We do this through Relationships Education/Relationships and Sex Education.

We ensure that appropriate filters and monitoring systems are in place that do not lead to unreasonable restrictions in what children can be taught with regard to online teaching and safeguarding.

### Online safety

We recognise that online safety is a major concern for all professionals. We understand that it is essential for children to be safeguarded from potentially harmful and inappropriate online material. For more information and support, staff will refer to the 'information and support' section of Annex D: Online Safety in *KCSiE*, 2021.

We recognise at this school that all information technology, whether personal or work based, is a whole school issue and all staff have a duty to be vigilant. We recognise online safety is a major concern for all professionals.

An effective approach to online safety empowers us to protect and educate the whole school community in our use of technology and we will work with our information technology partners to identify, intervene in and escalate any incident, where appropriate.

The breadth of issues classified within online safety is considerable but can be categorised in four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content such as pornography, 'fake news', racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- **contact:** being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising, as well as adults posing as children or



young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi nudes) and/ or pornography, sharing other explicit images and online bullying;
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include 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 DSL and any parental engagement.

We take seriously our duty to assist parents and help them with online safeguarding. As such, we make them aware of relevant support services, including those listed on pages 151-152 of *KCSiE, 2021*.

We accept that many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst in our setting, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually, view, share pornography, and other harmful content. These incidents will be managed in line with our peer-on-peer procedures.

Where children are being asked to learn online at home we will follow the advice to support schools and colleges do so safely: [safeguarding in schools colleges and other providers](#) and [safeguarding and remote education](#). We recognise the NSPCC and PSHE Association also provide helpful advice.

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we will do all that we reasonably can to limit children's exposure to risks from our IT system. We will ensure we have appropriate filters and monitoring systems in place. We will do this by considering the age range of our children, the number of children, how often they access the IT system and the proportionality of costs versus risks.

The appropriateness of our filters and monitoring systems have been informed in part, by the risk assessment required by the Prevent Duty.

We have the appropriate level of security protection in place, in order to safeguard our systems, staff and learners and we will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

Our School Standards Committee will question school leaders to gain a basic understanding of our approach to keeping children safe online and learn how to improve this approach, where appropriate.

### Safe use of electronic devices

We ensure the safety and welfare of the children in our care. Personal electronic devices are not ordinarily permitted within this setting, when in the presence of children, without SLT permission.

Therefore, we will ensure that:

- personal electronic devices are kept in a secure place and not accessible throughout contact time with the pupils;
- photographs or images of any children within our care are only taken following parental consent and only by using a school device and that those images remain within the setting
- when on outings, electronic devices are only used to make or receive phone calls relating directly to ensuring the safety and well-being of the children.

We follow the good practice guidance from the Information Commissioners Office, on [taking photographs in educational institutions](#). In the interests of safeguarding, a common-sense approach on a case-by-case basis will be taken in this area.

### The use of ‘reasonable force’

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances 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.

We will always follow the DfE advice for schools on the use of [Reasonable Force in Schools](#). We will also have regard to additional guidance [Reducing the Need for Restraint and Restrictive Intervention](#) for children and young people with learning disabilities autistic spectrum conditions and mental health difficulties in health and social care services and special education settings.

We believe that the adoption of a ‘no contact’ policy at our school could leave staff unable to fully support and protect our pupils. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEND, mental health concerns or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

We will plan positive and proactive behaviour support. For instance, through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed.

### Hiring out our facilities and/or premises

Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by us, under our own direct supervision or management, our own arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including inspecting these; we will ensure that there are arrangements in place to liaise with us on these matters where appropriate. We will also ensure 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 may lead to termination of the agreement.

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

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact that a child has a social worker and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this information will be used by the DSL (or deputies) to inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### Children requiring mental health support

We recognise that we have an important role to play in supporting the mental health and well-being of our pupils.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The SSC have put clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

We will help prevent mental health problems by promoting resilience as part of our integrated whole setting approach to social and emotional well-being which is tailored to the needs of our pupils.

As part of Community Academies Trust, we adhere to the Trust-wide guarantee of universal, targeted and specialised mental health provision minimum offers, details of which can be viewed on our website. Contact details of our Strategic Mental Health Lead can be found in Appendix 3.

### **Suicide Intervention**

We accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We work with our pupils and in partnership with external agencies to support anyone in our school community that may have thoughts of suicide, making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject: <http://zerosuicidealliance.com/>

### **Children who are Looked After or who were Previously Looked After**

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. The school ensures that staff have the necessary knowledge, skills and understanding to keep children who are looked after and children who were previously looked after safe. The DSL will hold details of each child's social worker and the name and contact details of the virtual school head in the Local Authority that looks after the child. They ensure that all staff have information they need in relation to a child's looked after status and the child's contact arrangements with birth parents for those with parental responsibility. They will also have information about a child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

When dealing with children who are looked after and previously looked after we will work with all agencies to take prompt action where necessary to safeguard these children.

### **The Designated Teacher for Children who are Looked After**

The SSC has appointed a designated teacher to work with the local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who

have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher has appropriate training and relevant qualifications and experiences to fulfil this role.

We follow the statutory guidance on The Roles and Responsibilities of the Designated Teacher.

### Virtual School Heads

The designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of children who are looked after in the school and meet the needs identified in the child's personal education plan (PEP). The designated teacher also works with the virtual school head to promote the educational achievement of children who were previously looked after.

We follow the statutory guidance on Promoting the Education of Looked After Children.

### Care Leavers

The DSL understands the ongoing responsibilities of local authorities to the young people who cease to be looked after and become care leavers. The DSL will hold details of the local authority Personal Advisor appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

### Children who have Special Educational Needs and/or Disabilities (SEND) or Physical Health Issues

We recognise that children who have SEND or certain health conditions can face additional safeguarding challenges. We appreciate the additional barriers that can exist when recognising abuse and neglect of children in the group. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To help address these additional challenges we will provide extra pastoral support for children with SEND.

### Staff

All staff members, including supply teachers, contractors, volunteers and visitors are informed of the name of the DSL and deputies and the school's procedures for protecting children, for example, how to report their concerns or suspicions and how to receive, record and report disclosures.

Staff should not accept personal invitations to visit the homes of children unless permission or instruction has been sought from the Headteacher or DSL and it is viewed as a professional appointment. For example, supporting education welfare issues etc. This should be viewed on a case-by-case basis. To support this, guidance from the DfE (September 2010) states 'Meetings with pupils away from the school premises should only be arranged with the specified approval of the headteacher and the prior permission of the pupil in question'. We accept this guidance from the DfE, stating that in the case of private meetings: 'Staff and volunteers should be aware that private meetings with individual pupils could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another pupil or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place'.

## Parents

Parents play an important role in protecting their children from abuse. All schools are required to consider the safety of the child and should a concern arise, professional advice will be sought prior to contacting parents. If deemed appropriate, parents will be contacted, and the school will continue to work with them to support the needs of their child. Consent from the parents will be sought, although in exceptional circumstances and with the best interests of the child being considered, this may be overridden.

We aim to help parents understand their responsibility for the welfare of all children, which includes their duty to refer cases to social care services and/or police in the interests of the child. The SSC will include a child protection statement in our school prospectus and all parents can view a copy of this policy.

Parents who have concerns regarding a member of staff can in the first instance raise those with the Headteacher. This may involve the school then sharing those concerns with relevant agencies. Where the parent has concerns regarding the headteacher, the chair of the SSC should be consulted in the first instance.

Parents can liaise with Ofsted on such conduct issues or regulatory concerns. Advice can be found on its website [www.ofsted.gov.uk](http://www.ofsted.gov.uk).

On occasions Ofsted may forward complaints that potentially raise a safeguarding concern about our school via Family Connect. In such instances we will work with all agencies within Family Connect to clearly respond to Ofsted on a case-by-case basis.

Parents/carers can also access Ofsted **Parent View** which is an online survey questionnaire where parents can give their views. Where possible, this will be monitored regularly by the school to quickly address any concerns.

All complaints should be made via our school complaints procedures.

We will keep parents informed of all areas of safeguarding and child protection through the regular methods of communication.

We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely, they from us. If a parent's behaviour is a cause for concern, then we will ask them to leave the school premises. We wish to make it clear that in serious cases, the Headteacher may notify parents in writing that their implied licence to be on the school premises is temporarily revoked, subject to any representations that the parent may wish to make. This school will give parents the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

Schools are private places. We will therefore act to ensure they remain a safe place for all. The public, including parents, have no automatic right of entry.

Our school expects parents to talk to us about any concerns they have regarding the care and education provided by us in the first instance. We urge all parents not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

### Changing in School

We consider arrangements for safe changing of children for physical education (PE). We will be guided by the NSPCC guidance Best Practice for PE Changing Rooms.<sup>11</sup> This consideration will come under our duty and remit of health & safety and in the context of children's welfare. We follow the guidance and do what we need to do in relation to organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations for drama productions and using off-site changing rooms.

## 7. A Safer School Culture

### Safer Recruitment

The school pays full regard to the safer recruitment expectations detailed in Part three of *Keeping Children Safe in Education, 2021*.

The school is supported by CAT's Human Resources team, who are available to advise on the management of safer recruitment procedures, including for the following:

- recruitment, selection and pre-employment vetting;
- Disclosure and Barring Service (DBS) checks;
- prohibitions, directions, sanctions and restrictions;
- pre-appointment checks;
- DBS update service;
- employment history and references;
- single central record;
- individuals who have lived or worked outside the UK;

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<sup>11</sup> [NSPCC factsheet](#)



- agency and third-party staff (supply staff);
- trainee/student teachers;
- existing staff;
- volunteers;
- governors, associate members and proprietors;
- contractors;
- visitors;
- alternative provision; and
- adults who supervise children on work experience.

We are committed to creating a culture of safer recruitment and, as part of this, we adopt robust recruitment procedures that help deter and prevent people who are unsuitable to work with children from applying for, or securing, employment or volunteering opportunities in our school.

This school maintains a single central record of pre-appointment checks. As we are part of Community Academy Trust, the Trust will maintain the section of the single central record detailing checks carried out on Academy Directors, though this information is available upon request to all schools in the Trust.

Appropriate training in safer recruitment has been completed by members of SLT and others who are involved in recruitment. The school ensures that there is always at least one such trained colleague involved in all staff / volunteer recruitment processes and sitting on the recruitment panel. At least one member of the SSC should have also completed Safer Recruitment training.

### **Pre-appointment vetting checks, regulated activity and recording information**

We will abide by the legal requirements when appointing individuals to engage in regulated activity relating to children. We understand the importance of ensuring the correct pre-appointment checks are carried out. These checks will help us to identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). We see this as part of our wider safeguarding regime which will carry on following appointment.

### **Other checks that may be necessary for staff, volunteers and others**

We will carry out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. We will fulfil our responsibilities in relation to other settings, including alternative provision, work experience and host families.

### **Visitors**

We have different types of visitors, those with a professional role, those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity.

We do not request DBS checks and barred list checks, or ask to see DBS certificates for visitors, such as children's relatives or those attending an in-school event.

For visitors who attend our school in a professional capacity, we will check their ID and seek assurance that the visitor has had the appropriate DBS check (or that the visitors and employers have confirmed that their staff have appropriate checks).

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

A record of visitors is maintained and all visitors are easily identified by a visitor's lanyard or badge.

The Headteacher will use their professional judgement to determine the need to escort or supervise visitors.

### Alternative provision

For any children placed in external alternative provision, we continue to be responsible for the safeguarding of that pupil, and we will ensure that the provider meets the needs of the pupil.

We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

### Adults who supervise children on work experience

This school, when organising work experience placements will ensure that the placement provider has policies and procedures in place to protect children from harm. We will ensure that, where relevant, checks, including barred list checks, have been obtained for people who supervise any children under the age of 16 on a work experience placement.

### Children staying with host families (homestay)

If the school arranges a homestay, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

We will always consider what intelligence/information will best inform our assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. We will use our professional judgement to decide what will be relevant.

To help inform our assessment, we will obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow us to consider, alongside all other intelligence that we have obtained, whether the adults would be a suitable host for a child. We will also decide whether it is

necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

### **Host families - homestay during exchange visits**

This school has a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

We will follow the guidance set out in Annex E of *KCSiE, 2021* with regarding to arrange homestay - suitability of adults in UK host families, homestay - suitability of adults in host families abroad and the additional action for extended homestays.

We will always ensure pupils understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

### **Private fostering**

Private fostering occurs when a child under the age of 16, or under 18 if the child is disabled, is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, the school will encourage parents and private foster carers to notify them and will share information with Children's Social Care as appropriate.

### **Our ongoing safeguarding of children and the legal reporting duties on us**

We understand the importance of safeguarding vigilance beyond the recruitment process.

We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to ensure the safety and welfare of children is embedded in all of our processes and procedures, and consequentially enshrined in our ethos.

We aim to promote continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

We aim to create the right culture and environment so that our staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which

may have implications for the safeguarding of children. This can help assist us as employers to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in our care.

We will undertake our duty to refer to the Disclosure and Barring Service and to the Teaching Regulation Agency where required.

## Appendix 1 - The Role of the Designated Safeguarding Lead

This school gives the Designated Safeguarding Lead the authority they need to carry out the duties of their post. We give them time, funding, training, resources, supervision and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

The DSL will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council Education Safeguarding Team.

They will complete the Safeguarding Audit - Education each year and submit to TWSP. The Safeguarding Audit - Education will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

### Deputy Designated Safeguarding Leads

Deputy DSLs are appointed and trained to the same standard as the DSL and their role is explicit in their job description. Some of the activities of the DSL may be delegated to these appropriately trained deputies, but the ultimate lead responsibility for child protection, as set out above, remains with the DSL. This lead responsibility will not be delegated.

### Manage referrals

The DSL will:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- refer cases where a crime may have been committed to the Police as required.

### Working with others

The DSL will:

- act as a point of contact with the three safeguarding partners;
- liaise with the Headteacher to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;

- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies, and
- act as a source of support, advice and expertise for all staff.

## Training

The DSL (and any deputies) will undergo training to provide them with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's Child Protection and Safeguarding Policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- provide safeguarding supervision to other DSLs;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

## Raising Awareness

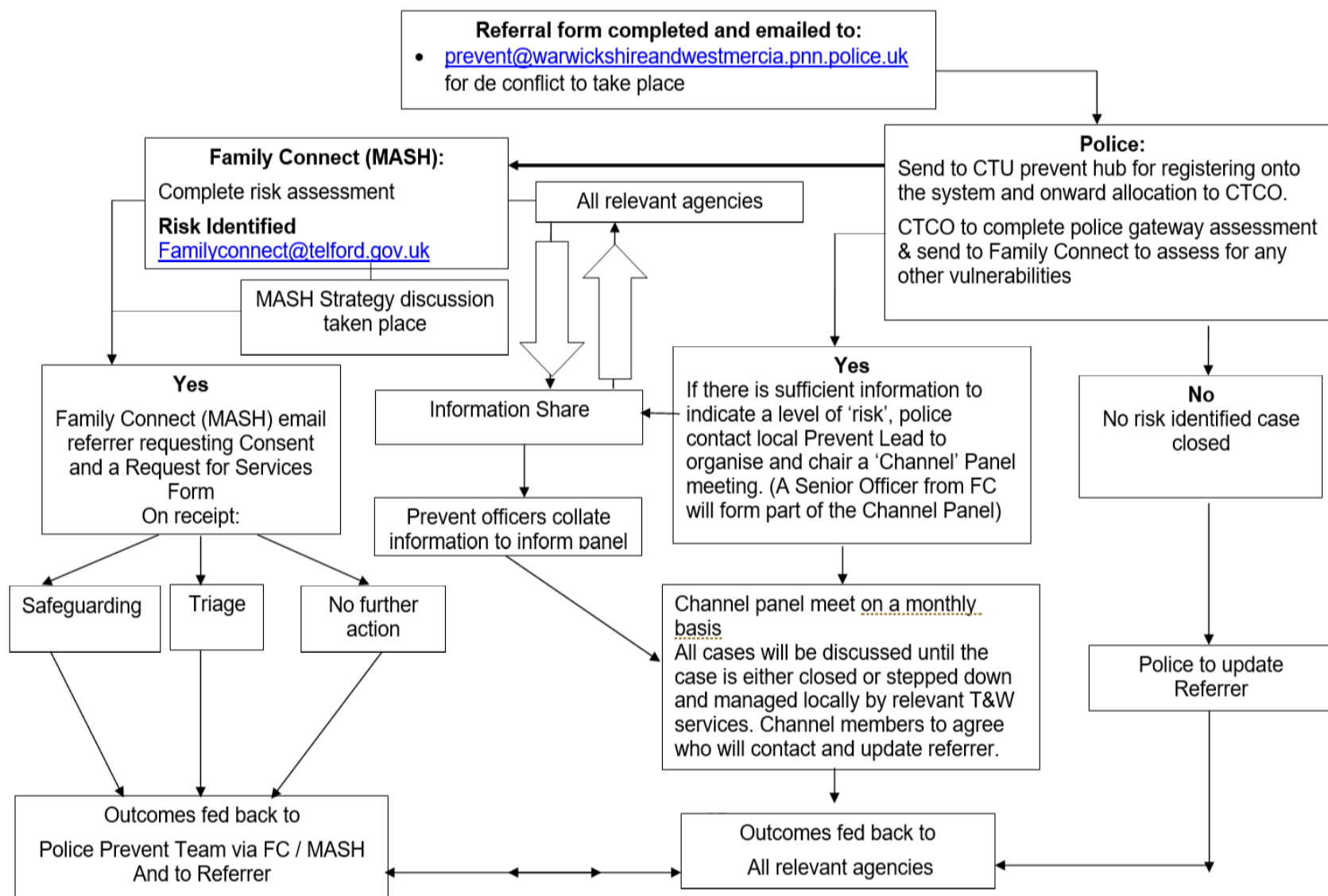
The DSL will:

- ensure the school's child protection policies are known, understood and used appropriately;

- ensure the school’s child protection policy is reviewed annually (as a minimum) to ensure any school specific addendums are in place and work with governing bodies regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; 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 to best support these children.



## Appendix 2 - Telford and Wrekin Prevent Pathway



Family Connect (MASH) will discuss with Police HAU to support the completion of a risk assessment at the earliest opportunity

If referral is adult led and children are identified as being present / resident within the family home, the referral form will be shared with Family Connect along with all supporting evidence

Safeguarding, Triage and No further action are key outcomes following the completion of 'Request for services' form

Agreed outcomes will be shared between Family Connect and Police

## Appendix 3 - Key Safeguarding Personnel in Schools

### Key personnel in Grange Park Primary School

Role	Name	Contact details
<b>The Designated Safeguarding Lead (DSL)</b>	Lisa Millington	email: <a href="mailto:lisa.millington@taw.org.uk">lisa.millington@taw.org.uk</a> tel: 01952 387470
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	Zoe Meredith	email: <a href="mailto:zoe.meredith@taw.org.uk">zoe.meredith@taw.org.uk</a> , tel: 01952 387947
<b>Other staff members trained to undertake the functions of the Designated Safeguarding Lead</b>	Richard Thorpe Rebecca Marshall Ian Lambie Donna Gray	email: <a href="mailto:richard.thorpe@taw.org.uk">richard.thorpe@taw.org.uk</a> , <a href="mailto:rebecca.marshall@taw.org.uk">rebecca.marshall@taw.org.uk</a> <a href="mailto:ian.lambie@taw.org.uk">ian.lambie@taw.org.uk</a> <a href="mailto:donna.gray@taw.org.uk">donna.gray@taw.org.uk</a> tel: 01952 387490
<b>Mental Health Lead</b>	Jemma Roberts	email: <a href="mailto:jemma.roberts@taw.org.uk">jemma.roberts@taw.org.uk</a> tel: 01952 387470
<b>Nominated Safeguarding Governor</b>	Louise Weaver	email: <a href="mailto:louise.weaver@taw.org.uk">louise.weaver@taw.org.uk</a> tel: 01952 387490
<b>Headteacher</b>	Richard Thorpe	email: <a href="mailto:richard.thorpe@taw.org.uk">richard.thorpe@taw.org.uk</a> tel: 01952 387490

## Key personnel in Telford Langley School

Role	Name	Contact details
<b>The Designated Safeguarding Lead (DSL)</b>	Kevin Preece	email: <a href="mailto:Kevin.Preece@taw.org.uk">Kevin.Preece@taw.org.uk</a> tel: 01952 386700
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	Lucy Evans	email: <a href="mailto:Lucy.Evans1@taw.org.uk">Lucy.Evans1@taw.org.uk</a> tel: 01952 386700
<b>Other staff members trained to undertake the functions of the Designated Safeguarding Lead</b>	Shanine Thomas Maria Hayward Ceri Kinsey Jackie Walters	email: <a href="mailto:Shanine.Thomas2@taw.org.uk">Shanine.Thomas2@taw.org.uk</a> <a href="mailto:Maria.Hayward1@taw.org.uk">Maria.Hayward1@taw.org.uk</a> <a href="mailto:Ceri.Kinsey@taw.org.uk">Ceri.Kinsey@taw.org.uk</a> <a href="mailto:Jackie.Walters@taw.org.uk">Jackie.Walters@taw.org.uk</a>  tel: 01952 386700
<b>Mental Health Lead</b>	Kevin Preece	email: <a href="mailto:Kevin.Preece@taw.org.uk">Kevin.Preece@taw.org.uk</a> tel: 01952 386700
<b>Nominated Safeguarding Governor</b>	Sami Mirza	email: <a href="mailto:Carolyn.Weston@taw.org.uk">Carolyn.Weston@taw.org.uk</a> tel: 01952 386700
<b>Headteacher</b>	Steven Carter	email: <a href="mailto:Steven.Carter@taw.org.uk">Steven.Carter@taw.org.uk</a> tel: 01952 386700

## Key personnel in Telford Park School

Role	Name	Contact details
<b>The Designated Safeguarding Lead (DSL)</b>	Katie Shewring	email: <a href="mailto:Katie.Shewring1@taw.org.uk">Katie.Shewring1@taw.org.uk</a> tel: 01952 387400
<b>Deputy Designated Safeguarding Lead (DDSL)</b>		email: tel: 01952 387400
<b>Other staff members trained to undertake the functions of the Designated Safeguarding Lead</b>	Louis Hylton Marc Clark Lucy Evans	email: <a href="mailto:Louis.Hylton@taw.org.uk">Louis.Hylton@taw.org.uk</a> <a href="mailto:Marc.Clark@taw.org.uk">Marc.Clark@taw.org.uk</a> <a href="mailto:Lucy.Evans1@taw.org.uk">Lucy.Evans1@taw.org.uk</a>  tel: 01952 387400
<b>Mental Health Lead</b>	Katie Shewring	email: <a href="mailto:Katie.Shewring1@taw.org.uk">Katie.Shewring1@taw.org.uk</a> tel: 01952 387400
<b>Nominated Safeguarding Governor</b>	Sami Mirza	email: <a href="mailto:Carolyn.Weston@taw.org.uk">Carolyn.Weston@taw.org.uk</a> tel: 01952 387400
<b>Headteacher</b>	Holly Rigby	email: <a href="mailto:Holly.Rigby@taw.org.uk">Holly.Rigby@taw.org.uk</a> tel: 01952 387400

## Key personnel in The Telford Priory School

Role	Name	Contact details
<b>The Designated Safeguarding Lead (DSL)</b>	Heather Murphy	email: <a href="mailto:Heather.Murphy@taw.org.uk">Heather.Murphy@taw.org.uk</a> tel: 01952 386 400
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	Letitia Suarez	email: <a href="mailto:Letitia.Suarez@taw.org.uk">Letitia.Suarez@taw.org.uk</a> tel: 01952 386 400
<b>Other staff members trained to undertake the functions of the Designated Safeguarding Lead</b>	Clare Tabberer Kevin Burns Kate Chappell Cheryl Young Claire Thomas	emails: <a href="mailto:clare.tabberer@taw.org.uk">clare.tabberer@taw.org.uk</a> <a href="mailto:kevin.burns@taw.org.uk">kevin.burns@taw.org.uk</a> <a href="mailto:kate.chappell@taw.org.uk">kate.chappell@taw.org.uk</a> <a href="mailto:cheryl.young@taw.org.uk">cheryl.young@taw.org.uk</a> <a href="mailto:claire.thomas@taw.org.uk">claire.thomas@taw.org.uk</a>  tel: 01952 386 400
<b>Mental Health Lead</b>	Heather Murphy	email: <a href="mailto:Heather.Murphy@taw.org.uk">Heather.Murphy@taw.org.uk</a> tel: 01952 386 400
<b>Nominated Safeguarding Governor</b>	Fiona Lovegrove	email: <a href="mailto:TPS.governors@taw.org.uk">TPS.governors@taw.org.uk</a> * tel: 01952 386 400
<b>Headteacher</b>	Stacey Jordan	email: <a href="mailto:Stacey.Jordan@taw.org.uk">Stacey.Jordan@taw.org.uk</a> tel: 01952 386 400

\*N.B - Confidential content should not be sent to this email address.

## Key personnel in Windmill Primary School

Role	Name	Contact details
<b>The Designated Safeguarding Lead (DSL)</b>	Jason Millington	email: <a href="mailto:Jason.millington@taw.org.uk">Jason.millington@taw.org.uk</a> tel: 01952 386360
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	Kizzie Coles	email: <a href="mailto:Kizzie.coles@taw.org.uk">Kizzie.coles@taw.org.uk</a> tel: 01952 386360
<b>Other staff members trained to undertake the functions of the Designated Safeguarding Lead</b>	Melanie Dexter	email: <a href="mailto:Melanie.dexter@taw.org.uk">Melanie.dexter@taw.org.uk</a> tel: 01952 386360
<b>Mental Health Lead</b>	Jason Millington	email: <a href="mailto:Jason.millington@taw.org.uk">Jason.millington@taw.org.uk</a> tel: 01952 386360
<b>Nominated Safeguarding Governor</b>	Graham Parkinson	email: <a href="mailto:graham.parkinson2@taw.org.uk">graham.parkinson2@taw.org.uk</a> tel: 01952 386360
<b>Headteacher</b>	Mark Gibbons	email: <a href="mailto:Mark.gibbons@taw.org.uk">Mark.gibbons@taw.org.uk</a> tel: 01952 386360