



**WREKIN**  
LOVE THE JOURNEY

**WREKIN COLLEGE  
SAFEGUARDING AND CHILD PROTECTION  
POLICY AND GUIDELINES**

## **SAFEGUARDING AND CHILD PROTECTION POLICY AND GUIDELINES**

*This policy applies to all staff, governors and volunteers working in the school. It also applies to all pupils at the school*

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This policy is available to parents both on the school's website and as a paper copy on request from the Head(s) PA.

This policy is written in accordance with inter-agency procedures in line with Telford & Wrekin Safeguarding Partnership (TWSP) – Child Protection Policy and Procedures, which are reviewed and updated on an ongoing basis.

**This policy replaces the previous policy of January 2025**

## Commitment To Review

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on yearly basis by a named person responsible below, who shall be accountable for that action. This policy will also be updated to reflect any statutory changes arising from the Children’s Wellbeing and Schools Bill or future safeguarding legislation and statutory guidance.

Child Protection Policy and Safeguarding Policy 2025-26 - Document Status			
Date published by Telford and Wrekin Safeguarding Partnership:	25 July 2025	TWSP 2025 updates incorporated into the Wrekin College Policy	KCSIE updates incorporated into the Wrekin College Policy
Date of policy creation:	01.09.25	Person responsible for creation:	David Blackham
Date of policy inception:	01.09.25		
Date of policy adoption by Governing Body/Board:	September, 2025		
Date of policy review for 2025/26:	<b>01.09.26</b> <i>This policy will be reviewed annually, or sooner if there are significant changes to national or local safeguarding legislation, statutory guidance, or best practice.</i>	Person responsible for review:	David Blackham

**The Designated Safeguarding Leads (DSL), David Blackham and Jill Spence, are the persons responsible for this policy.**

The Nominated Governor for Safeguarding and Child Protection, Laura Lenander, oversees the school’s Child Safeguarding and Child Protection Policy and Procedures.

The minutes of the Autumn Term Governors’ Meeting each year show that the Nominated Governor and DSLs discussed and approved the annual review of the school’s Safeguarding and Child Protection Policy and Guidelines.

**Wrekin College is a member of the Telford & Wrekin Education Safeguarding Partnership Group, working collaboratively with local schools and agencies to strengthen safeguarding practice and ensure consistent protection for all children.**

**ANY DEFICIENCIES OR WEAKNESSES IN CHILD PROTECTION ARRANGEMENTS ARE REMEDIED WITHOUT DELAY**

**Nominated Governor for Safeguarding and Child Protection:** Laura Lenander

**Designated Safeguarding Leads (DSL):** David Blackham (DBI) Supervising DSL, also the Senior Deputy Head (Pastoral); Jill Spence (JSp) Day-to-day DSL

**Deputy Designated Persons (DDP):** Steve Morton (SM), Claire Ferley (CDF),

**Wrekin Trust Safeguarding Adviser:** Jill Spence (JSp) Day-to-day DSL

**PREVENT Lead:** David Blackham (DBI) Supervising DSL

**CSE Lead:** Jill Spence (JSp) Day-to-day DSL / David Blackham (DBI) Supervising DSL

**Designated Teacher for Looked After Children (LAC):** Jill Spence (JSp) Day-to-day DSL

**Early Help Lead:** Jill Spence (JSp) Day-to-day DSL

**Contact Details:** see **Appendix I.**

## **Related School Policies**

**This policy should be read in conjunction with the following Wrekin Safeguarding Policies**

- Adults Living in Boarding Accommodation Policy and Declaration
- Anti-Bullying and Child-on-Child Abuse Policies
- Behaviour, Rewards and Sanctions Policy (includes permissible sanctions and use of physical intervention to restrain pupils)
- Bereavement Policy
- Code of Conduct for All Staff and Governors
- Controlled Drugs and Misuse of Substances Policy
- Complaints Policy and Procedures
- Conducting Interviews, Searches and Confiscation Procedures (Pupils)
- Confiscation and Conducting Searches Policy
- Data Protection Policy - Confidentiality of Information
- E-Safety and Online Safety Policies
- Equality and Diversity Policy
- Games and Sporting Activities Policy and Guidelines
- Giving Advice When Answering Questions and Confidentiality of Information Policy (Appendix 7 of this document)
- Health and Safety Policy
- Health and Wellbeing Centre and First Aid Policy (includes intimate care)
- Missing Pupil Policy
- Organisation and Conduct of Educational Trips Policy and Guidelines
- Prefects' Policy
- PSHE Policy
- Risk Assessment Policy
- Safer Recruitment Policy (includes taking photographs and videos)
- Safeguarding Supervision Policy
- Welfare and Health Policies - Pupils (includes Alcohol and Smoking Policies)
- Wellbeing and Mental Health Policies and Guidelines - Pupils (includes depression, self-harm, eating disorders and suicide intervention)

- Visiting Speaker Policy
- Whistleblowing Policy

## **Standard 8 of the Boarding Schools National Minimum Standards**

**8.1** The school should ensure that:

- arrangements are made to safeguard and promote the welfare of pupils at the school; and
- such arrangements have regard to any guidance issued by the Secretary of State.

**8.2** The school should ensure that all staff are aware that safeguarding and promoting the welfare of children is everyone's responsibility throughout the school and the boarding facilities.

**8.3** It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school's approach to online safety should be reflected in the child protection policy, having regard to the Department's Keeping children safe in education guidance.

**8.4** Keeping children safe in education sets out that boarding schools have additional factors to consider with regard to safeguarding. As such it will be important that the boarding school's child protection policy (and/or other policies if appropriate) reflect:

- the school's policy on sexual relationships between children (and importance of boarders understanding this policy);
- the school's approach to child-on-child abuse, reflecting the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation;
- the approach to protecting children where there is a significant gender imbalance in the school; and
- the approach to harmful online content and how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3, 4 and 5G that will bypass the school's filtering and monitoring systems.

### **Appendix B of the Boarding Schools National Minimum Standards - List of records**

The following school records (relating to safeguarding) are required:

1. Child protection allegations or concerns
2. Major sanctions
3. Use of reasonable force
4. Complaints and their outcomes
5. Individual boarders' records (containing personal, health and welfare information)
6. Administration of medication, treatment and first aid (kept confidentially)
7. Significant illnesses
8. Significant accidents and injuries
9. Parental permission, where required, for medical and dental treatment, first aid and non-prescription medication
10. Risk assessments, and action taken in response to risk assessments
11. Staff recruitment records and checks (including checks on others given unsupervised access to children or residential accommodation)
12. Staff duty rotas
13. Staff supervision, appraisal and training
14. Fire precaution tests and drills
15. Risk assessments under the Regulatory Reform (Fire Safety) Order 2005

16. Menus
17. Pocket money and any personal property looked after by staff
18. Care plans (where applicable)
19. Parental permission for high risk activities
20. Checks on licensing of relevant adventure activities centres
21. Assessments of lodgings arranged by the school
22. Assessment of off-site accommodation used by the school
23. Suitability of any guardianship arrangements

The governing body undertakes an annual review of the school's child protection and safeguarding policy and procedures and of the efficiency with which the related duties have been discharged.

**Date Policy Signed Off by the Governing Body:**

**Review completed:**

**Date of next review on or before: 1st September 2026** - *This policy will be reviewed annually, or sooner if there are significant changes to national or local safeguarding legislation, statutory guidance, or best practice.*

**Signed by the Head:**

**Signed by the Chair of Governors:**

## Document Updates

Date	By	Comments	Location of saved file
For information concerning updates between 2012 and July 2015 please see the 2017 Policy			
<b>July 2015</b>	SEC	Training details updated. Ref to updated/new key documentation – Working Together To Safeguard Children (March 2015), KSCIE July 2015, Information Sharing (March 2015) and What to do if you're worried a child is being abused (March 2015).	Google Drive Website
<b>September/October 2015</b>	SEC	Training details updated re WRAP3. Reporting FGM to local police – mandatory from October 2015.  Wrekin Policy checked against T&W SCB updated Policy (October) and adjusted accordingly – adjustments made to extremism p26.	Draft for Govs
<b>November 2015</b>	SEC	Updated policy, October 2015, signed off by Governors November 2015.	Google Drive Website
<b>January 2016</b>	SEC	Wrekin Policy checked against T&W SCB updated Policy (January 2016) and adjusted accordingly – <ul style="list-style-type: none"> <li>• Concerns re bruising, the school will follow T&amp;W SCB guidance.</li> <li>• Domestic Violence, Drug and Substance Misuse, Gang Activity, Fabricated and Induced Illness now included (see Child Welfare section).</li> <li>• Ref to 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings' produced by the Safer Recruitment Consortium October 2015.</li> </ul>	Circulated to all staff and governors.  Google Drive Website
<b>July 2016</b>	SEC	DRAFT – with ref to KCSIE Sept 2016 Re-ordered for better flow. Change of Headmaster added.	SEC's computer and Google Drive
<b>August 2016</b>	SEC	Draft policy reviewed by the Nominated Governor and the DSL - amended as necessary. This policy replaces the January 2016 policy as from 5th September 2016.	Google Drive Website (as of 5th September 2016)
<b>October 2017</b>	SEC	Minor changes in line with T&W SCB. Ref to <ul style="list-style-type: none"> <li>• Web page 'Parent Info' (parents notified)</li> <li>• Honour Based Violence</li> </ul>	Google Drive and Website October 2017
<b>July 2018</b>	SEC	Wrekin Policy checked against T&W SCB updated Policy (July 2018) and adjusted accordingly for September 2018.	Google Drive Website (as of 3rd September 2018)

<b>September 2018</b>	SEC	DoE updates to KCSIE 2018 checked and included e.g. updated flow chart KCSIE pg13; ref to point the school must make a referral to DBS.	Google Drive and Website 1st October 2018
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<b>March 2019</b>	SEC	Children Missing Education added to Appendix 5. Replaced Mark Turner with Mr Scott Thomas-White: Education Safeguarding Children Co-ordinator, Telford & Wrekin Council, Access and Inclusion, School Performance and Development.	Google Drive and Website April 2019
<b>July 2019</b>	SEC	Updated with reference to KCSIE September 2019 issued to staff on 28th August 2019 ready for 2nd September 2019.	Google Drive and Website as of 2nd September
<b>September 2019</b>	SEC	Cross checked with TWSP Reviewed and Updated Policy - changes made as appropriate. Some changes made to some paragraphs to improve the flow. T&WSCB as from 29th September TWSP.	Google Drive and Website as of 30th September
<b>August 2020</b>	SEC	Updated with reference to KCSIE September 2020 and in line with TWSP as circulated on 20th August 2020. New Safeguarding Supervision Policy in place. Specific safeguarding concerns updated (Appendix 5 in 2019 document removed).	Google Drive and Website 1st September
<b>September 2020</b>	SEC	Minor change owing to the withdrawal of the DfE COVID-19 guidance to schools that related to safeguarding.	Google Drive and Website 28th September
<b>January 2021</b>	SEC	Contact details for T&W LADO updated.	Google Drive and Website January 2021
<b>September 2021</b>	AWr	Updated with reference to KCSIE September 2021 (including removal of Covid-19 specific appendices) and the September 2021 update to Sexual violence and sexual harassment between children in schools and colleges.	Google Drive and Website 20th September 2021
<b>September 2022</b>	DTu/ AWr	DTu updated with reference to KCSIE September 2022. DSLs, Nominated Governors and Deputy DSLs updated. AWr updated with ref to NMS Sept 2022.	Google Drive and website updated Oct 2022
<b>September 2023</b>	DTu/ AWr	DTu updated with reference to KCSIE 2023 Nominated governor updated	Google Drive and website updated September 2023
<b>August 2024</b>	DTu/ SEC	DTu and SEC updated with reference to KCSIE 2024. DDP Kirsty Davies and Wrekin Old Hall Trust Safeguarding Adviser Jill Spence added	Google Drive and website updated September 2024
<b>September 2024</b>	SEC	Checked against TWSP Safeguarding Policy.	Google Drive and website updated September 2024

<b>31st December 2024</b>	SEC	Changes to the Safeguarding Team made – ref to David Blackham taking over as Senior Deputy Head (Pastoral) and Supervising DSL.	Google Drive and website updated January 2025
<b>August 2025</b>	DBI/ JSp	DBI and JSp updated with reference to KCSIE 2025. DDP Steve Morton and Claire Ferley added. Safeguarding Governor updated to Laura Lenander. TWSP KCSIE 2025 updates integrated into the Wrekin College Policy.	Google Drive and website updated September 2025

## PART I: INTRODUCTION

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■  
*Professionals must combine an open-minded attitude with decisive action, when alleged concerns about a child are clearly indicated.*

*The safety and protection of all children is of paramount importance to all those involved in Education (Children Act 1989). There can be no greater issue of importance to parents, or to schools, than the safety of their children; safeguarding, therefore, remains a priority across all aspects of Wrekin's work.*

### Summary

We have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2002 (as amended). This policy has been developed in line with legal obligations, including, where applicable, the Human Rights Act 1998, the European Convention on Human Rights, the Domestic Abuse Act 2021, the Children and Social Work Act 2017, the Equality Act 2010, and the Public Sector Equality Duty.

This policy is aligned with the statutory guidance Keeping Children Safe in Education (KCSIE) 2025, Working Together to Safeguard Children 2023, the Early Years Foundation Stage (EYFS) Framework 2025, and the Relationships, Sex and Health Education (RSHE) Statutory Guidance July 2025. It reflects the latest definitions, expectations, and safeguarding responsibilities for all staff, volunteers, and governors in educational settings.

We will also follow the DfE's What to do if you are Worried a Child is Being Abused – Advice for Practitioners. We recognise that the NSPCC website provides additional information on abuse, neglect, exploitation, and indicators of harm.

This policy is aligned with the statutory guidance Keeping Children Safe in Education 2025, which comes into force on 1 September 2025. It reflects the latest definitions, expectations, and safeguarding responsibilities for all staff, volunteers, and governors in educational settings.

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 children reside in.

### Definitions

#### Abuse

'Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. 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. They may be abused by an adult or adults, or another child or children'. KCSIE September 2025

## Staff

For the purpose of this document 'staff' includes all those in the school community (teaching and support staff), including supply teachers, volunteers (which includes governors), visiting professionals working with pupils in the school (e.g. a counsellor) and those supporting school visits.

## Child

The term child or children refers to any young person 18 or under. For all pupils at Wrekin, including those who are over 18, this policy is followed.

## Staff and Governors' Responsibilities

- All staff and governors must be conversant with this policy.
- All staff and governors are given a copy of KCSIE September 2025.
  - Governors, the DSL and the Deputy Designated Persons will read all parts of the document.
  - All members of staff (teaching, support staff and volunteers) are expected to read and understand at least Part one, or Annex A (a condensed version of Part one) for support staff who do not work directly with children.

We will maintain a record of all those who have read Part one and Annex B of KCSIE. The school recognises that best practice would be for all staff to be acquainted with all parts of KCSIE.

Annex B of KCSIE 2025 shall be referred to in all circumstances where further support and advice are required by this school.

All School Prefects are given a copy of this policy, the safeguarding cue card and receive child protection training with the Designated Safeguarding Lead (DSL) before taking up their positions of responsibility.

For avoidance of doubt, the role of governing bodies of all schools is set out in KCSIE effective from 1st September 2025. This guidance, coupled with Working Together to Safeguard Children 2023 Chapters 2 and 3, and the areas identified above within the context, is the blueprint for all multi-agency working and is available and accessible to all those responsible for children's welfare.

## Our Approach to Safeguarding

Wrekin staff are an important part of the wider safeguarding system for its pupils. At Wrekin 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 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;
- 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.**

**All staff, supply staff, contractors and visitors, are informed of the names of the DSLs and DDPs and the school's procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures.**

**Wrekin is committed to identifying children who may benefit from early help.** Early help means providing support as soon as a problem emerges at any point in a child's life (see Part 11 for further information).

**The role of the DSLs and the Deputy Designated Persons** is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

All teachers, including the Head(s), in accordance with the [Teachers' Standards 2021](#) will safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

**All members of staff receive an induction** so they are aware of the safeguarding systems in the school. They will receive appropriate safeguarding and child protection training to provide them with the relevant skills and knowledge to safeguard children effectively.

At Wrekin staff will never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

## Aims of the Policy

1. The aims of this school policy are to make all (pupils and staff) within the school feel safe and for the school to have clear roles and responsibilities in place for that to happen.
2. The school's duty of care will be in line with government legislation and the local authority's Safeguarding Partnership (TWSP) procedures.
3. At Wrekin 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 should consider, at all times, what is in the best interest for the child. See the 'safeguarding' definition above.
4. Primary responsibility for the care and protection of children rests with parents, but a range of services is available to help them in this task. Many referrals to agencies are made by parents seeking help for themselves. Relatives, friends and neighbours may also directly, or encourage families to, seek help or alert statutory authorities to children about whom they are concerned. All agencies with staff that are in direct contact with children and families must be involved.

### At the heart of our policy lies:

- **Prevention** (a positive and talking school, strong pastoral care, careful and vigilant teaching, effective support for children, provision of good adult role models, provision of good senior pupil role models, an effective and robust safer recruitment policy and procedures);
- **Protection** (training of all staff and senior pupils to be alert in the signs/symptoms which give rise to child protection concerns and how to respond appropriately and sensitively to concerns, following agreed procedures);
- **Support to pupils** who have reported concerns;
- **Support to staff** who have been involved in any investigation

## Purpose of the Policy

1. Parents/carers need to be in no doubt that this policy is Wrekin's commitment towards the statement above and we expect that they embrace everything that is documented in our policy. In principle parents sign up to our school ethos, the law and the legislation that sits behind it.
2. Children can develop a special and close relationship with the school community and view them as significant and trustworthy adults. For the purpose of these policies and for avoidance of doubt, the school community includes all those that work at the school (teachers, support staff and governors) and parents and volunteers that play a regular active role at the school.
3. All of the school community believe that our school should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of the individual child.
4. It is not surprising therefore that a child, if they have been abused, may confide or disclose to a teacher or another member of staff. For staff to interpret any concerns, this school will assess each incident as it appears. In respect of assessing any bruising to a child, this school will refer to 'Bruising of Children' guidance produced by TWSP to assist their decision-making.

### It is important to note the four defined categories of abuse being:

- Physical
- Sexual
- Emotional
- Neglect

### Other categories of abuse include:

- Discriminatory

- Financial
- Institutional

But not forgetting **bullying**, which can transgress across all four definitions.

Our policy and all supplementary policies and procedures are published on our website for all to view. This policy reflects the changes outlined in Annex F of Keeping Children Safe in Education 2025, including updates on gender questioning children, online safety, and DSL responsibilities. It will be reviewed annually and updated in line with any further statutory change

At Wrekin all staff are trained on the indicators of abuse and neglect to help them to identify children who may be in need of help or protection. This is important because children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or may be being threatened. This could be owing to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. Staff should also endeavour to build trusted relationships with children and young people which facilitate communication.

We are aware that abuse, neglect and safeguarding issues are rarely stand-alone events. All members of 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 Deputy Designated Persons, will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

As a school we also recognise that extremist views in children can be a sign of potential abuse and will be dealt with in the same way as any other concerns children may face whilst in our care.

All staff are trained to be aware that technology is a significant component in many safeguarding and wellbeing issues. 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 other children online; this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. See Part 5 of this document for further information on e-safety and online safety.

For further information on the following safeguarding concerns: Domestic Violence, Adult's Mental Health Impact on Children, Special Education Needs, Children With a Disability, Female Genital Mutilation, Honour Based Violence, Child Trafficking, Modern Slavery, Forced Marriage, Suicide Intervention, Young Carers, Children in the Court System, Homelessness, Adoption, Children Returned to their Family from Care, Sexual Violence, Sexual Harassment, Child Sexual Exploitation, Child Criminal Exploitation, Initiation or Hazing, Drug and Substance Misuse, Gang Activity, County Lines, Fabricated and Induced Illness - see Part 11 on Children's Welfare. All our staff will be made aware of all these safeguarding issues that children may face whilst in our care, signs and symptoms to look out for as potential indicators of abuse, and what steps they need to take if they are aware of them. For avoidance of doubt Annex B of KCSIE 2025 will be referred to for any assistance that the DSL or any other school staff may need in ensuring a child's safety and welfare.

5. Because of the day-to-day interaction with children, members of school staff are also in a unique position to notice
  - Change in demeanour such as a child being quieter than usual, 'clingy' towards staff, withdrawn or not wishing to go home at the end of the day;
  - Change in circumstances;
  - Injuries, marks or bruises when for instance children are doing PE, games or swimming which might indicate a child has been abused.

**As a boarding school, supervision has to be extra vigilant to ensure the wellbeing of all of its children.**

As a boarding school we understand the additional factors we must consider with regard to safeguarding. Members of staff are alert to inappropriate pupil relationships and the potential for child on child abuse. We will follow all guidance as set out in KCSIE 2025 and The National Minimum Standards for Boarding Schools 2022.

Some overseas pupils do not return home during holidays. During exeat, boarders may remain at school or stay with their guardian.

**The school has a separate Homestay Policy.** However, Homestays are no longer used by our school but should that change, the Homestay Policy will be reviewed and updated accordingly. The Homestay File is kept in the Head(s) Office.

In all cases, if staff are unsure, they should always speak to the DSL.

**See Appendices 4 and 5 for further information.**

## PART 2: THE POLICY

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1. Life at Wrekin is based upon mutual respect; consideration of others and of self have equal value and the promotion of happiness and contentment for all members of the community is reliant upon ensuring that it is provided for each individual child and adult within the school.
2. Child protection is rooted in ensuring that the school organisation, its activities, staffing and procedures are aimed at providing an environment in which young people feel secure and happy and in which their individual needs are met.
3. We practise safer recruitment in checking the suitability of staff and volunteers to work with children.
4. We endeavour to raise awareness of child protection issues and equip children with the skills needed to keep them safe.
5. Child protection will have the highest priority in the school and as a minimum we will protect young people from physical, sexual or emotional abuse and monitor to ensure that they are not neglected.
6. We will also provide a range of opportunities and levels of support to enable each young person to express any fears, concerns or worries that they have either within or in the home environment.
7. We will support pupils who have been abused in accordance with his/her agreed Child Protection Plan.
8. If a young person expresses fears, concerns or worries or makes a disclosure these will be taken seriously and the child protection procedures will be sensitively instigated, always ensuring that the security, safety, happiness and wellbeing of the young person remains the paramount consideration.
9. We will work appropriately with each child, their family and other agencies to protect, in all cases, the welfare of the child. Furthermore we will work in partnership and fulfil the ethos and abide by the principles of the [threshold guidance](#) produced by Telford & Wrekin within the Family Connect Model. Furthermore, all school staff will be prepared to identify children who may benefit from early help. For the avoidance of doubt, early help means this school will provide support as soon as a problem emerges at any point in a child's life.
10. 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 should be kept under constant review and consideration given to a referral to Children's Social Care (CSC) assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
11. **Staff within this school will also be made aware of the process for making referrals to CSC regarding the early help process 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 (as identified on pages 17-19 of KCSIE 2025), along with the role they might be expected to play in such assessments. Also, staff will be made aware of the flowchart from KCSIE 2025 page 24 'Actions where there are concerns about a child' – Appendix 8 of this document.**
12. On occasions the school, where necessary, may be asked to participate in multi-agency meetings and in cases of sexually harmful behaviour (including social media and youth produced sexual imagery known as 'sexting'), may be asked to undertake a risk and vulnerability management plan. This school will use the TWSP's 'Sexually Harmful Behaviour Risk Assessment Tool' to assist them if this is deemed necessary and appropriate, so clear support is in place. This will be recorded and kept under review within school and with other partner agencies. Furthermore, the school recognises that children are capable of abusing other children (including online) and that this will not be tolerated, and whilst participating in the above processes, the school will not pass off the abuse as 'banter', 'just having a

laugh', 'part of growing up' or 'boys being boys' (See Part 11 on 'Children's Welfare' for more detailed information). Any intervention will consider the victim, alleged perpetrator, all other children and, if appropriate, adult students and staff. Also we will engage with parents to manage and agree this process of intervention for all those involved.

13. Our role is to pass on the information received, and **under no circumstances** become the investigator.
14. We also work to TWSP procedures for all staff who work with children, where allegations may be made by a child/adult of abuse in any form. All staff will adhere to the procedures drawn up by TWSP, in line with national guidelines. We will adhere to Part Four of KCSIE September 2025: 'Allegations of abuse made against teachers and other staff'. The process for managing allegations can be viewed at <http://westmidlands.procedures.org.uk/> Section 1.14 'Allegations against staff and Volunteers' and Part Four of KCSIE 2025
15. The school will maintain a register of child protection issues and confidential files on individual children known to be, or suspected of, being at risk.
16. The school believes that those who work within the school community are in positions of trust and, as such, codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE there is a separate Code of Conduct, which is issued to all staff and governors and is published on the school's website. All staff and governors are required to complete, sign and return the proforma as proof that they have read and understood the Code of Conduct.
17. The school will meet all the requirements as set out in Part Three of KCSIE September 2025: 'Safer Recruitment'.

## PART 3: THE ROLES AND RESPONSIBILITIES OF DIFFERENT MEMBERS OF THE SCHOOL COMMUNITY

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**All staff and governor meetings have safeguarding and child protection as an agenda item on them; this is testament to Wrekin making these a priority and keeping them at the forefront of our minds.**

### A. The Head(s) and Governors

1. The Head(s) and governors are committed to working together to create and maintain a safe learning environment for the children and young people attending the school. As a school with charitable status, the Head(s) and governors are aware of their duties as charity trustees to safeguard children (as outlined at <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>).
2. The Head(s) and governors will follow the specific guidance as set out in Chapters 2 and 3 of 'Working Together to Safeguard Children' 2023 and KCSIE September 2025 and will ensure that:
  - a. The policies, procedures and training are effective and comply with the law at all times;
  - b. Clear arrangements are in place to encourage, facilitate and support the reporting of safeguarding and child welfare concerns in a timely manner, including instances where pupils are missing from school;
  - c. Appropriate safeguarding policies and procedures are understood and followed by **all** staff; these policies and procedures should be monitored and evaluated regularly (annually, as a minimum);
  - d. The policies include the following elements:
    - i. An effective child protection policy (THIS document), which ensures systems are in place for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. These systems will be well promoted, easily understood and easily accessible by all children. Where there is a safeguarding concern, governors and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
    - ii. A behaviour policy, which includes measures to prevent bullying
    - iii. A staff Code of Conduct
    - iv. Appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions.
  - e. They facilitate a whole school approach to safeguarding, such that all systems, processes and policies should operate within the best interests of the child at their heart;
  - f. A Designated Person is available at all times whilst pupils are under direct supervision of school staff;
  - g. Provision is made for appropriate training, induction, support and supervision of Designated Persons and all other members of the school's community and workforce **including the governing body**;
  - h. The school works with the Local Authority Designated Officer (LADO) and appropriate partner agencies proactively to safeguard pupils;
  - i. Records relating to safeguarding are kept safely and shared appropriately;

- j. Where our school uses alternative provision and work experience placements, that we continue to be responsible for the safeguarding of that pupil, as identified in Part three of KCSIE 2025;
- k. The school premises are safe. Where public rights of way exist on school grounds then appropriate risk assessments are undertaken;
- l. Appointments to staff positions and other roles within the school community are made following the safer recruitment guidance within Part three of KCSIE 2025 and all appropriate vetting checks are completed (see part 4 of this policy: safer recruitment);
- m. Safer recruitment training has been completed by appropriate members of selection panels (see part 4 of this policy – safe recruitment);
- n. The school's Single Central Record of recruitment and vetting checks covering all staff and others identified by the school as having regular contact with children is kept up-to-date in line with Ofsted/ISI requirements;
- o. The identity of visitors to the school is checked, a record made in the visitors' book, suitably identified/badged and that visitors are not left unsupervised within the school.
- p. Where reasonably possible, that the school holds more than one emergency contact number for each pupil, such that the school has additional options for making contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

## Use of school premises for non-school activities

Where governing bodies hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), they must ensure that appropriate arrangements are in place to keep children safe. Under these circumstances, as a school, our duty will be to seek assurances from the provider that they have the appropriate safeguarding and child protection policies and procedures in place (including via inspecting these as necessary), and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governors will ensure that safeguarding requirements are included in any transfer of control (i.e. lease or hire agreement) as a condition of use and occupation of the premises, and that failure to comply with this will lead to a termination of the agreement. The agreements these providers should have are detailed in [Keeping children safe in out-of-school settings](#). In practical terms, these governing body responsibilities are devolved to the Supervising DSL who will liaise with the Head of Operations for day-to-day checking of such matters.

## B. The Nominated Governor for Child Protection and Safeguarding (Laura Lenander)

The nominated governor for safeguarding and child protection will play an essential role in ensuring children in this school are kept safe from harm. The child protection and safeguarding governors play an important role in ensuring oversight and scrutiny of the Safeguarding and Child Protection Policy, procedures and practice on behalf of the full governing body.

The governors' responsibilities for child protection and safeguarding are ultimately collective ones.

**Role of the Nominated Governor: see Appendix 3.**

## C. The Role of the Day-to-day Designated Safeguarding Lead (DSL)

During term time there is always at least one member of the safeguarding and child protection team available to discuss any safeguarding concerns should they arise.

If the Day-to-day DSL is absent then the Supervising DSL, or a Deputy Designated Person (DDP) will act as the DSL. However, the ultimate **lead responsibility** for safeguarding and child protection will remain with the Day-to-day DSL.

The DSLs, Cross Trust Safeguarding Adviser and DDPs form part of a borough wide network of school DSLs, where information is shared, in a two-way process, with the Telford & Wrekin Council LADO ('designated officer': KCSIE 2025) and Safeguarding Children in Education Officer.

The Day-to-day DSL acts as the focal point for all matters concerning safeguarding children and young people. There is regular liaison with the Supervising DSL (at least weekly, but in practice, as needed). One of the primary tasks is to act as the contact between school, the family and other agencies.

### Responsibilities:

#### Management of Referrals and Information Sharing

1. **The Day-to-day DSL is expected to:**
  - Refer cases of suspected abuse to the local authority CSC as required;
  - Support staff who make referrals to local authority CSC;
  - Refer cases to the Channel Programme where there is a radicalisation concern as required;
  - Support staff who make referrals to the Channel Programme;
  - Work alongside the Head(s) to refer cases where a person has been dismissed or left owing to risk/harm to a child to the Disclosure and Barring Service as required;
  - Work alongside the Head(s) to refer cases where a crime may have been committed to the police as required.
2. The DSL has direct referral links with the **Social Care Safeguarding Advisors & Safeguarding Team via the Family Connect Team 01952 385385** (or other relevant local authority CSC). For avoidance of doubt the DSL should be the point of contact with regard to referring a child if there are concerns about possible abuse. All referrals to Family Connect will be followed up in writing by completing a [request for service](#) form within 24 hours.
3. The DSL will make it clear to all staff that **if the DSL or someone from the Safeguarding Team is not available, then this should not delay in sharing any concerns about a child** to the Safeguarding Advisors Team via The Family Connect Team on 01952 385385. However, this school endeavours to ensure that there is always a nominated DSL or DDP presence on site for referral of safeguarding and child protection issues.

#### Expanded Responsibilities of the DSL

In addition to the responsibilities already outlined, the DSL will also (*KCSIE 2025, pp.115–116*):

- Promote awareness that mental health difficulties can sometimes be an indicator of abuse, neglect or exploitation.
- Ensure child protection files are transferred promptly and securely to any new school or setting, with confirmation of receipt obtained.
- Oversee and coordinate staff training in emerging safeguarding issues, including online harms, filtering and monitoring responsibilities, and gender-questioning children.
- Maintain up-to-date knowledge of national and local guidance, ensuring that safeguarding arrangements are consistent with statutory requirements and best practice.

## E-Safety and Online Safety

E-safety is an important aspect of safeguarding and child protection. The school is committed to improving safety for its pupils through the above and through e-safety training for pupils and parents. The DSL works alongside key personnel to monitor online safety and training in school. For further details see below and part 5 of this document. In line with Annex C of KCSIE 2025, the DSL is also responsible for understanding the setting's filtering and monitoring systems, supporting staff with safeguarding concerns, and promoting a culture of listening to children.

## Filtering and Monitoring Systems

In accordance with *KCSIE 2025* (Annex C, p.178), the school ensures that robust filtering and monitoring systems are in place to protect pupils from harmful online content and contact. These systems will be:

- Age-appropriate, accessible and proportionate.
- Regularly reviewed by the DSL and the school's ICT lead to ensure effectiveness.
- Reported annually to governors, with outcomes included in the safeguarding report.

The DSL has lead responsibility for understanding and overseeing filtering and monitoring arrangements, supporting staff where concerns are identified, and promoting a culture of vigilance around online safety

## Records and Data Protection

1. The **DSL keeps all written records of concerns about a child** even if there is no need to make an immediate referral for action; this will include any online misuse issues that may cause indirect abuse to a child. Online safety will be treated as any other form of abuse and recognition that bullying can transgress across all four defined categories of abuse including bullying and harassment.
2. The DSL will ensure that **all such records are kept confidentially and securely** (as per the Data Protection Act 2018 and the UK GDPR) and are separate from pupil records, ensuring that an indication of further record keeping in terms of child protection is marked on the pupil's records.
3. The DSL will store and share information as required for safeguarding purposes, including information which is sensitive and personal, which will be treated as 'special category personal

data'. Such data may be shared without consent where there is a good reason to do so, such that the sharing of information will enhance the safeguarding of a child in a timely manner. The DSL will consult with the following two government guides regarding information sharing for further advice, if necessary: [Information Sharing Advice for Safeguarding Practitioners](#), and [Data protection: toolkit for schools](#).

4. The school will not provide pupils' personal data where the serious harm test under the legislation is met. Further advice will be sought from the relevant legislation if need be:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-the-harm-test>

## Multi-agency Working and Working With Others

1. The DSL and any deputies will work with other agencies in line with Working Together to Safeguard Children. We are committed to embedding the national multi-agency child protection standards introduced in Working Together to Safeguard Children 2023. These standards guide our practice in identifying, assessing, and responding to safeguarding concerns, and ensure that our work with partners is timely, proportionate, and focused on improving outcomes for children. The Day-to-day DSL will liaise with the Supervising DSL and the Head(s) to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; this includes awareness of the requirement for children to have an Appropriate Adult. See Police and Criminal Evidence Act 1984 [PACE Code C 2019 Statutory Guidance](#);
2. The DSL will, as required, liaise with the 'case manager' (i.e. the person who initially holds the information from whatever source - the Head(s) or the Chairman of Governors) and the LADO in cases which concern a member of staff.
3. The DSL will liaise with staff (especially pastoral support staff, the School Nurses, SENCO, Network Manager and Support for Learning) on matters of safety and safeguarding (including e-safety and online safety) and when deciding whether to make a referral by liaising with relevant agencies.
4. **The DSL will act as a point of contact with the three safeguarding partners and work with other agencies** in line with [Working Together to Safeguard Children](#). [NPCC-When to call the police](#) should help the DSL understand when they should consider calling the police and what to expect when they do.
5. **Multi-agency working:** The governing body and the DSL are familiar with the TWSP arrangements. They will engage with the TWSP as required. They will follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the child resides to follow the local protocol for assessments. The governing body expects staff to work with social care, the police, health service 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 multi-agency plans to provide additional support to children subject to child protection plans. We will never restrict access for CSC to conduct a section 17 or section 47 assessment.
6. The DSL will ensure that information regarding any pupil currently subject to a Child Protection Plan and deemed 'at risk', who is **absent without explanation for two days**, is shared with Children's Services Family Connect Safeguarding Team (or other relevant local authority CSC).
7. The DSL will notify Children's Services Social Care Safeguarding Team if the school should have to **exclude a pupil who is the subject of a Child Protection Plan** (whether fixed term or permanently).
8. The DSL will ensure that **pupils given positions of responsibility** over other pupils are briefed on the appropriate action to take should they receive any allegations of abuse.
  - All School Prefects are given a copy of this policy and the child protection cue card.

- All members of the Peer Support Team receive child protection training as well as training specific to their peer listening role.

The DSL will act as support, advice and expertise for all staff.

9. When children leave the school, the DSL will ensure their child protection file is transferred (securely, and with a request for confirmation of receipt) to their new school or college ASAP, to allow appropriate support to be given by the new establishment. Further information may also be shared with the new establishment as appropriate.

## Training and Raising Awareness

1. The DSLs and deputies will have received training (updated at least every two years) to provide them with the knowledge and skills required to carry out the role and will liaise in accordance with TWSP procedures. It is the professional responsibility of the DSL and deputies to update their own training gaps/needs with enhanced updates and training which are held throughout the year and regularly offered by the TWSP, conferences/workshops offered by private providers and other mainstream providers. If in doubt, KCSIE 2025 Annex C should be referred to for clarification about the role of the DSL. The Role of the DSL and their Deputies is made explicit within Job Descriptions.
2. The **DSLs and deputies will ensure that they have received training and are confident in dealing with online safety issues.** It is the responsibility of the DSL to assess their own confidence and skill set and to ensure that they have the skills to support and report if need be. It is recognised that online safety is an ever changing process and any information that is cascaded down should also be shared on a whole school basis if it is of generic content, such as new and existing social media applications that may be harmful to a child's welfare.

**All staff should be conversant with the school's E-Safety and Online Safety Policies.**

3. The DSL will have due regard to safeguarding incidents and/or behaviours that can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the Designated Safeguarding Lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. CSC assessments should consider such factors so our school 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 the full context of any abuse. Additional information regarding contextual safeguarding is available here: <https://www.contextualsafeguarding.org.uk/>
4. The DSL will ensure that all members of **staff have received appropriate child protection training** within the advised timescales. These staff will include full time, temporary and volunteer staff.
5. The DSL will make known to the whole school community **the location of the TWSP** website address <http://www.telfordsafeguardingboard.org.uk> where the policies & procedures are on view; these are regularly reviewed and updated by the TWSP.
6. The DSL will ensure that all members of staff undergo face-to-face safeguarding and child protection training and online safety training at induction and satisfy themselves that each member of staff understands their responsibility for sharing a concern and with whom. Furthermore, all staff will receive regular safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) to provide staff with relevant skills and knowledge to safeguard children effectively. This will also allow staff

to contribute to and shape safeguarding arrangements and child protection policy. Staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. Formal training will be refreshed every three years, except for staff working with early years children, their formal training will be refreshed every two years. All staff will also receive at least annual child protection and safeguarding updates (including online safety), to provide them with relevant skills and knowledge to safeguard children effectively. All staff will receive annual training in child sexual exploitation awareness. We will ensure staff safeguarding training is integrated, aligned and considered as part of the whole Wrekin College safeguarding approach and wider staff training and curriculum planning and training helps staff to understand local safeguarding procedures. We will maintain a record of training.

7. Therefore, **all school teaching staff will be given a copy of the school's Safeguarding and Child Protection Policy** (which explicitly refers to processes in school where there may be concerns for a child's welfare and how to respond), the school's **Behaviour, Rewards and Sanctions Policy**, Part One of **KCSIE 2025**, **a copy of the flowchart from KCSIE 2025** page 24 'Actions where there are concerns about a child' Appendix 8 of this document) and Annex B of KCSIE 2025 Staff who are not regularly in direct contact with pupils will be given a copy of Annex A of KCSIE 2025 as a minimum.
8. The DSL will ensure that **the safeguarding and child protection policy is available publicly** (school's website) and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the school's role in this.

## Staff and Governor Training

All staff and governors will receive regular safeguarding training that includes specific updates on online safety. Training will cover:

- the *Four Cs* of online risk (content, contact, conduct, and commerce), including the impact of misinformation, disinformation, and conspiracy theories;
- safe and responsible use of **generative AI** technologies;
- effective use of the school's **filtering and monitoring tools** and how these support safeguarding; and
- updates to **Relationships, Sex and Health Education (RSHE)** to ensure teaching reflects current risks and statutory guidance.

This training will be refreshed in line with statutory requirements and whenever significant new risks or guidance are identified.

## Artificial Intelligence and Emerging Risks

The school acknowledges the emerging safeguarding risks associated with artificial intelligence (AI), including deepfakes, manipulated images, and algorithm-driven exploitation (*KCSIE 2025*, Annex C, p.181). The school will:

- Educate pupils and staff on the risks of AI-generated content, misinformation and manipulation online.
- Incorporate guidance on AI and digital resilience into the RSHE and computing curriculum.
- Ensure staff receive training updates to remain alert to new and evolving online threats.

**The DSL preserves a distinction between children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies.**

When making a referral to the local authority, the DSL contacts the Social Care Safeguarding Team Helpdesk via the Family Connect Team. For avoidance of doubt the Designated Person(s) should be the point of contact with regard to referring a child if there are concerns about possible abuse. A formal written referral should not delay a verbal discussion so that immediate action can be taken if necessary. However, any referral should be confirmed in writing within 24 hours. Contact details for Family Connect: see Appendix I.

### Opportunities to teach safeguarding

1. We will teach children about how to keep themselves and others safe, including online. Our RSHE curriculum is delivered in accordance with the RSHE Statutory Guidance July 2025. It is age-appropriate, inclusive, and designed to equip pupils with the knowledge and skills to recognise and report abuse, understand healthy relationships, and manage their mental and physical wellbeing. RSHE contributes to our wider safeguarding culture and is responsive to the needs of our pupils.
2. We will ensure that appropriate filters and monitoring systems that are in place, do not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
3. Safeguarding themes are integrated across the curriculum, including RSHE, computing, and pastoral education. Lessons are adapted to meet the needs of SEND and EAL learners, and pupil voice is used to inform curriculum planning. Staff are trained to deliver safeguarding content in an age-appropriate and inclusive manner.

### D. The Staff

1. All those in the school community, including supply teachers, visiting professionals working with pupils in the school (e.g. the School Counsellor), those who support sex education (e.g. specialist visiting professional), external providers of school activities and those supporting school visits, are informed of the name of the DSLs and the school procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures:
  - During their first induction to the school
  - Through a copy of this policy
2. All members of staff are required to be alert to signs of abuse. They should report any concerns or suspicions if not immediately, as soon as possible, that day to the DSL. If in doubt they should talk with the DSL; **delay is unacceptable**.
3. We recognise that children cannot be expected to raise concerns in an environment where colleagues fail to do so. All of the school community should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Unacceptable standards, conduct or behaviour should be challenged appropriately at the outset, and will not be tolerated. A separate Code of Conduct policy for staff has been adopted by this school.

4. The school's 'Whistleblowing Policy' covers raising concerns. However, where staff feel that they cannot report a concern through the above channels, general guidance can be found at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/> The NSPCC Whistle Blowing 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)
5. The school recognises its duty to ensure that all staff, volunteers and contractors feel confident to raise concerns about safeguarding or any other matter of public interest. We are committed to creating a culture of openness where individuals can report concerns without fear. In line with the Public Interest Disclosure Act 1998, staff who raise genuine concerns under this policy are protected from any form of detrimental treatment, victimisation, or dismissal as a result of whistleblowing. Any attempt to subject a whistleblower to such detriment will be treated as a serious disciplinary matter. Staff may raise concerns internally or through the NSPCC Whistleblowing Helpline, and the school will ensure that all disclosures are taken seriously, investigated appropriately, and handled sensitively.
6. Provision to view the TWSP website is accessible to all staff.

**All staff may also refer a suspected case of abuse directly to TWSP. Contact details can be found in Appendix 1. If a member of staff does inform Telford & Wrekin directly, they must let the DSL know.**

## **E. Senior Pupils**

Senior pupils are made aware of the need to report allegations or suspicions of child abuse to the DSL. Children often tell other young people, rather than staff or adults, about abuse. The DSL delivers safeguarding and child protection training to all School Prefects and the Lower Sixth. Members of the Peer Support Team are trained by a specialist outside counsellor and other senior pupils receive training from their Housemaster/Housemistress (HsM).

## PART 4: RECRUITMENT, INDUCTION, TRAINING, VISITORS AND ALTERNATIVE PROVISION

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Wrekin is committed to creating a culture of safe recruitment and, as part of this, we will adopt recruitment procedures that help deter, reject or identify people who might abuse children. The governing body will act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence, including criminal record checks, Disclosure and Barring Service (DBS) checks, barred list checks and prohibition checks, together with references and interview information.

### I. Safer Recruitment

The governing body is committed to preventing people who pose a risk of harm from working with children. We will adhere to all statutory responsibilities to check staff who work with children and take proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. Wrekin's recruitment procedures are intended to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities at the school.

We aim to create a culture that safeguards and promotes the welfare of all children. As part of this culture, we will adopt robust recruitment procedures that help to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our setting. We follow the safer recruitment procedures outlined in Part Three of KCSIE 2025, including checks for regulated activity, overseas checks, and recording of vetting information.

The governing body and Head(s) ensures that at least one of the persons who conducts an interview has completed safer recruitment training developed by the DfE/NCSL or NSPCC. This requirement is part of our policy on child protection.

#### **The recruitment process includes:**

1. Planning (job description and advertising);
2. Scrutinising and shortlisting;
3. Interviewing and assessing;
4. Checking employment history and obtaining professional references;
5. Completing checks of the applicant through the DBS and against the DBS list of those barred from working with children;
6. Checking the teacher's status with the Department for Education Teacher Services that the applicant is not prohibited from teaching if relevant;
7. Right to work in the UK check;
8. A section 128 (prohibition from management) check, if relevant;
9. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff. This includes obtaining (via the applicant) an enhanced DBS certificate (including a barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. DfE Guidance on [Recruiting teachers from overseas](#) will be consulted. In addition, the school will make any further checks we consider appropriate so that any relevant events that occurred outside the UK can be considered. These checks may include, where available:

- Criminal records checks for overseas applicants – Home Office guidance can be found on [GOV.UK](https://www.gov.uk) website; and for teaching positions;
- Obtaining a letter of professional standing from the professional regulating authority in the country (or countries) in which the applicant has worked, confirming that they have not imposed any sanctions or restrictions, and that they are not aware of any reason why they may be unsuitable to teach. Contact details of regulatory bodies in the EU/EEA and Switzerland can be located on the [Regulated Professions Database](#). Further advice about which EEA regulatory body to contact can be found here: the [UK Centre for Professional Qualifications](#).

10. A check of professional qualifications, where required;
11. Completing background and mental and physical health checks;
12. A selection process to identify the most suitable person for the post.

The school maintains a Single Central Record of pre-appointment checks.

**There is a separate school Recruitment Policy and Procedures document.**

Reference to this process can be viewed at [www.gov.uk](https://www.gov.uk)

**The school's Recruitment Policy meets Standard 19 of the National Minimum Standards for Boarding Schools – Staff recruitment and checks on other adults.**

An Enhanced DBS certificate and check of the Children's Barred List is completed for all persons age 16 or over (not on the roll of, or employed by, the school) who live on the same premises as boarders (ref Licence to Occupy written agreement).

All persons visiting boarding accommodation are accompanied by staff at all times to ensure unsupervised access to boarders or to their accommodation is prevented.

All staff and governors will receive safeguarding training as part of induction and through regular refresher sessions. Training will cover statutory requirements and emerging risks, including online safety threats such as misinformation and disinformation, the safe and responsible use of generative artificial intelligence, and the use and limitations of the school's filtering and monitoring systems. Staff and governors will also be kept up to date with statutory guidance, including Relationships, Sex and Health Education (RSHE), to ensure that safeguarding practice remains effective and responsive to the needs of all children and young people.

## Retention of Recruitment Records

The school is committed to complying with UK GDPR and the Data Protection Act 2018 in relation to the retention of personal data obtained during the recruitment process. Recruitment records, including interview notes, application forms, identity documents, references and vetting checks, will be retained only for as long as is necessary for safeguarding and compliance purposes.

- For unsuccessful candidates, records will normally be retained securely for **6 months** after the conclusion of the recruitment process, after which they will be confidentially destroyed, unless there is a legitimate reason to retain them longer (e.g. in the event of a complaint or safeguarding concern).
- For successful candidates, recruitment records will form part of the personnel file and will be retained in accordance with our staff records retention schedule, which ensures compliance with statutory

requirements and safeguarding guidance.

- The Single Central Record (SCR) will be maintained in line with current statutory safeguarding requirements.

The school reviews retention periods regularly to ensure records are not held for longer than necessary and that data is securely deleted or destroyed when it is no longer required.

## 2. Induction

Every new member of teaching staff, support and volunteers, including the peripatetic musicians and sports coaches, is required to attend a training session on safeguarding and child protection. Every effort will be made to hold a session before the member of staff starts work or within the first week of arrival as a new member of staff at the school.

### The training includes:

1. Identity and contact details of the DSL and Designated Persons;
2. Their personal responsibility, including their requirement to make a referral of **any safeguarding or child protection concerns about a child** to the Safeguarding Advisors Team via Family Connect on 01952 385385 **without delay**, if they are unable to contact the DSL or a DDP;
3. Familiarisation with this policy, which includes:
  - The categories of abuse, signs and symptoms, the need to be vigilant and to respond to a child who tells of abuse;
  - How to support and respond to a child who tells of abuse;
  - How to report their concerns and/or suspicions and how to receive, record and report disclosures, including child on child sexual violence and harassment;
  - That the school has a culture of listening to children and taking account of their wishes;
  - The school's response to children who go missing from education.
4. The provision to view the TWSP website is made accessible to all staff;
5. Online safety;
6. Managing sexual violence and sexual harassment;
7. Familiarisation with the Code of Conduct for All Staff and Governors Policy – including the procedure for reporting a wrong-doing (Whistleblowing);
8. Requirements to read Part One and Annex B of KCSIE September 2025 and to complete the declaration that they have read and understood the document, and will discharge their responsibilities with regard to it;
9. If in doubt they should talk with the Designated Safeguarding Lead; **delay is unacceptable.**

### Members of staff are also issued with the following school policies:

- Anti-Bullying and Child-on-Child Abuse Policies
- Behaviour, Rewards and Sanctions Policy (including the use of reasonable force and physical restraint)
- Code of Conduct for All Staff and Governors
- Data Protection Policy and Acceptable Use Agreement
- E-Safety and Online Safety Policies
- Games and Sporting Activities Policy and Guidelines - if applicable
- Support Staff Dealing With Pupil Poor Behaviour Policy – if applicable
- Whistleblowing Policy

**Members of staff are asked to complete a declaration to say that they have read and understood the above.**

### **3. Training of Staff and Volunteers**

**Safeguarding and Child Protection training is given to ALL teaching staff, governors, support staff and volunteers.**

**Safeguarding and Child Protection formal training for teaching staff is at THREE yearly intervals – due on or before Lent 2027 (new members of the teaching staff join the support staff rolling programme of training).**

**Safeguarding and Child Protection formal training for support staff and governors is at THREE yearly intervals – rolling programme in place.**

**Regular safeguarding updates and training during the course of the year as and when needed and at least annually.**

### **4. Nominated Governor Training**

The nominated governor will ensure that they have received safeguarding and child protection formal training with refresher training every THREE years.

- Safeguarding for School Governor - Laura Lenander
- Laura Lenander has also completed the required formal training for the Nominated Governor Safeguarding Lead..

### **5. The Designated Persons' Responsibilities and Training**

1. To ensure that they have received **safeguarding and child protection formal training** specific to their role with refresher training at TWO yearly intervals.
  - **DBI** due on or before November, 2026
  - **JSp** due on or before July, 2027
  - **CDF** due on or before August, 2027
  - **SM** due on or before May, 2027
2. It is the professional responsibility of the Designated Person(s) to update their own training gaps/needs with updates, which are held throughout the year and regularly offered by TWSP and other mainstream providers.
3. The DSLs should receive appropriate formal training every two years in order to:
  - Understand the assessment process for providing early help and intervention;
  - Have a working knowledge of how the local authority conducts 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 policy and procedures, especially new and part time staff;
    - Be alert to the specific needs of children in need, those with special educational needs and young carers;
    - Be able to keep detailed, accurate, secure written records of concerns and referrals;
    - 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.
4. **The DSL should receive additional updates to their knowledge at regular intervals, but at least annually.** TWSP email updates to the DSL throughout the course of the year and offer termly updates.

Details of individual staff safeguarding and child protection training are held by the DSLs (all teaching staff and School Prefects) and in the Bursary (all volunteers, peripatetic musicians and sports coaches, support staff, Matrons and School Nurses).

**The DSLs keep a record of the Designated Persons' formal training.**

## 6. All Pupils

Pupils are taught about aspects of safeguarding including online safety in PSHE lessons (which includes Relationships and Sex Education and Health Education, compulsory since September 2020, some of which is covered through external speakers), Computer Science lessons and in various Assemblies and Chapel Services.

The Wrekin Children's Safeguarding Board was established in 2020. The Wrekin Children's Safeguarding Board gives children at Wrekin a platform for their voices to be heard and listened to. The Board is made up of pupils across the three different Key Stages, with three or four pupils from each year group. The purpose of the Children's Safeguarding Board is to ensure that all pupils at Wrekin feel safe.

## 7. Senior Pupils

Senior pupils are made aware of the need to report allegations or suspicions of child abuse to the DSL. The DSL delivers safeguarding and child protection training to all School Prefects. Members of the Peer Support Team are trained by a specialist outside counsellor and other senior pupils receive training from their Housemaster/Housemistress (HsM).

All senior pupils are asked to complete the following online EduCare modules: Child Protection in Education, Safeguarding Young People, Preventing Bullying and The PREVENT Duty.

### School Prefects:

- Receive Safeguarding and Child Protection training with the DSL as part of their School Prefects' Induction Programme (Documents issued: Anti-Bullying and Child-on-Child Abuse Policies; Behaviour, Rewards and Sanctions Policy; E-Safety and Online Safety Policy; KCSIE September 2025 – Part One; Safeguarding and Child Protection Policy; School Prefects' Policy);
- Complete the four EduCare modules as above;

- Are given the school's safeguarding and child protection cue card.

## Curriculum and Wider Activity in Keeping Children Safe

Pupils receive guidance on how to keep themselves safe through the school's PSHE programme, Sixth Form Leadership Programme and the use of outside professionals, for example CEOP registered trainers.

The pupils are also trained in Online-Safety during Computer Science lessons.

There is a separate PSHE Policy and Programme of Study (for taught PSHE Curriculum up to the end of Fifth Form), whilst members of the Sixth Form follow a Life Skills Programme run by the Director of Sixth Form.

## 8. Parents

Wrekin aims 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. There is a child protection statement in the Parents' Handbook and all parents can view a copy of this policy.

From time to time the DSL will email parents safeguarding information and updates as appropriate. The PSHE Policy and Programmes of Study are sent to parents annually for their knowledge and to allow them to comment or ask questions.

## 9. Visitors

We understand we do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates for visitors. We will always request to see appropriate identification for visitors. The SLT will use their professional judgement to determine the need to escort or supervise visitors. A record of visitors will be made and all they will be suitably identified/badged.

**Staff organising a visiting speaker must follow the school's separate Visiting Speaker Policy**

## 10. Alternative Provision

For any children placed with an external alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, and we will need to be satisfied 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, i.e. those checks that the school would otherwise perform in respect of its own staff.

We will follow the statutory guidance for commissioners of Alternative Provision.

We will maintain up-to-date records of the address of the alternative provision provider, including any subcontracted or satellite sites the pupil may attend. We will ensure that we always know where the pupil is during school hours. We will review all alternative provision placements at least half-termly to ensure:

- the pupil is attending regularly,
- the placement remains safe and appropriate,

- and the provision continues to meet the pupil's needs.

Where safeguarding concerns arise, we will immediately review the placement and, if necessary, terminate it unless or until those concerns are satisfactorily addressed.

We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment. We will also obtain written confirmation that the alternative provider will inform us of any changes in staffing or other arrangements that may affect the safety or welfare of the pupil, so that we can ensure appropriate safeguarding checks are carried out on new staff.

## **11. Work experience**

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

## **12. Host Families - homestay during exchange visits**

1. We have 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 we arrange, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.
2. We will follow the guidance set out in Annex E of KCSIE with regard to arranging homestay – suitability of adults in UK host families, homestay – suitability of adults in host families abroad and the additional action for extended homestays.
3. 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.

**The school has a separate Homestay Policy.**

## PART 5: ONLINE SAFETY

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### All staff and pupils should be conversant with the following school documents:

- Online and E-Safety Policies, which includes the Use of Mobile Phones Policy
  - Remote Learning Guidelines
  - Code of Conduct for all staff and governors
1. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion. Any monitoring software that is used within the school will be reviewed and checked regularly. It is recognised 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.
  2. All within the school community must adhere to the school's Acceptable Use Policy and the E-Safety and Online Policies. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.
  3. On occasions unacceptable websites might be accessed inadvertently; if this occurs then the site will be closed immediately and the incident will be logged and reported to the SLT and ICT Team.
  4. E-safety is an important aspect of safeguarding and child protection. The school is committed to improving safety for its pupils through the above and through e-safety training for pupils and parents. E-safety is part of the Computer Science Department's Scheme of Work.
  5. It is recognised 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. The policies already mentioned cover the extent of this activity and its suitability, staff and pupils are to be left in no doubt that contravention of them will be forwarded to the appropriate agencies to be dealt with.
  6. Online safety is a growing and complicated area for all agencies. This school recognises that staff need to be aware that children with Special Education Needs and Disabilities (SEND) are particularly vulnerable and the unique risks associated with online safety because of their SEND recognition. That is not to say that the principle does not apply to any other children in our care. However, in light of the heightened vigilance needed in school for all, the links below will be made aware to staff in the quest for them to be confident to keep children safe online whilst they are at school. By doing this we wish staff to recognise the additional risks from online bullying, grooming and radicalisation and giving staff the capability to support all children.
  7. The use of technology has become a significant component of many safeguarding issues. With child sexual exploitation, radicalisation, sexual predation, technology often provides the platform that facilitates harm. An effective approach to online safety empowers this school 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. **Parents need to be in no doubt and work with us, support us in and out of school and be aware of this to assist us with effective online safeguarding. We CANNOT do this alone.** The aim of our approach to online safety is empowerment to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. We will ensure appropriate filtering and monitoring on school/college devices and networks. We aim to protect children from illegal, inappropriate or harmful content, and harmful online interaction with other users. We aim for our pupils to exhibit positive personal online behaviour and recognise inappropriate online conduct. We aim to protect children from commercial risks.
  8. The breadth of issues classified within online safety is considerable:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
  - **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - **Conduct:** 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; and
  - **Commerce:** risks such as online gambling, inappropriate advertising, phishing and financial scams. Such scams should be reported to the Anti-Phishing Working Group ( <https://apwg.org/>)
9. Online safety is a major concern for all professionals not only Social Media forums but issues around youth produced sexual imagery known as 'sexting' (see the school's separate policy on this).
10. E-safety training for all teaching staff will be regularly updated and will include the need for staff to be aware of their roles and responsibility in relation to filtering and monitoring internet use.

For information and support in these areas the following websites below are available for all staff and parents to view. The sites are for all age groups, parents and carers, which will form the basis and assist with e-safety education, support and policy in our school:

[Safe, Secure, Online](#)

[Thinkuknow](#)

[Child Exploitation and Online Protection \(CEOP\) Parents Protect](#)

[Be Internet Legends](#) developed by Parent Zone and Google

[The Lucy Faithfull Foundation](#) - work to protect children

[Stop It Now](#)

[Harmful online challenges and online hoaxes](#)

DfE guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of the existing curriculum requirements: [Teaching Online Safety In School](#)

**We will carry out regular reviews of online safety because technology in this area evolves and changes rapidly. This will help assure us that our online safety arrangements are effective.**

If we ask children to learn online at home we will consider DfE guidance to ensure they do so safely: [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and-remote-education](#). NSPCC and PSHE Association advice will also be sought:

- NSPCC Learning – [Online Safety Training](#)
- PSHE – [PSHE Association coronavirus hub](#)

**Wrekin takes seriously its duties to assist parents and help them with online safeguarding resources. From time to time the DSL will email parents safeguarding information and updates as appropriate.**

## Filters, Monitoring, Information Security and Access Management

The school will endeavour to ensure there are appropriate filters and monitoring systems in place (taking into account the age range of the children, the number of children, how often they access the IT system and the proportionality of costs vs risks – the latter to be informed in part by the risk assessment required by the Prevent Duty). The DSL will consult with the IT Committee, including the Network Manager, for advice and guidance on this matter, and guidance will also be sought from the [UK Safer Internet Centre: appropriate filtering and monitoring](#). Decisions will be made as to purchases based on consideration of current systems, costs and potential risks to pupils. Information will be sought from the government on [purchasing strategies](#) and [purchases](#) of this nature.

We meet the DfE's Filtering and Monitoring Standards (2023) and conduct an annual review of our systems, including a risk assessment of online access and exposure. In accordance with KCSIE 2025 Annex C, our DSL and Online Safety Lead understand the filtering and monitoring systems in place, are trained to manage them effectively, and know how to escalate concerns appropriately. We ensure our filtering and monitoring provision is proportionate to the risks faced by our pupils and supports a safe online environment.

Educational settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place, in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. The DSL will consider, with the IT Committee, at least annually, the security of the systems at Wrekin College. Guidance on e-security will be sought from the [National Education Network](#), [NCSC.GOV.UK](#) and the [Cyber security standards for schools and colleges](#).

## Reviewing Online Safety

Technology, and risks and harms related to it, evolve and change rapidly. The DSL, along with the Network Manager and Head of Computer Science, will carry out a review (at least annually) of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face. Reference will be made to the [360 safe website](#), as well as other resources on [p37 and Annex B of KCSIE 2025](#) in order to assist in our whole school approach towards online safety. The school will also use the [filtering and monitoring standards](#) as described on p39 of KCSIE 2025. Once reviewed in school, the governing body will also be sent the Online and e-safety policy in order to review its appropriateness.

## Remote Education

If the school has to undertake remote education again (such as that undertaken during the Covid-19 pandemic), we will follow government guidance produced to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely. This guidance includes [Safeguarding and remote education](#) and [Providing remote education: guidance for schools](#).

Communications with parents and carers during any time period of remote education will be used to reinforce the importance of children being safe online and we would try and help them to understand what systems schools and colleges use to filter and monitor online use. We will make it clear to parents and carers what their children are being asked to do online, including the sites they will be asked to access, in addition to the personnel from the school their child is going to be interacting with online.

## **This section of the policy outlines how the school ensures pupils' safety online in line with statutory requirements, including the Online Safety Act 2023.**

The school is committed to safeguarding and promoting the welfare of all pupils in both the physical and digital environment. Online safety is an integral part of our safeguarding responsibilities. We recognise that young people are growing up in a digital age, where access to online content, platforms, and communication technologies carries both opportunities and risks.

### **Legal and Statutory Framework**

Our approach to online safety is informed by the following:

- **Keeping Children Safe in Education (KCSIE) 2025**
- **Working Together to Safeguard Children (2023)**
- **Education Act 2002 (Section 175)** – duty to safeguard and promote welfare of pupils
- **Children Act 1989 & 2004** – safeguarding children from significant harm
- **Online Safety Act 2023** – duties on online service providers to prevent children's exposure to illegal and harmful content, introduce age-appropriate protections, conduct risk assessments, and provide reporting mechanisms.

The school aligns its practices with these statutory frameworks to ensure children are protected from online harms both within school and, as far as reasonably possible, beyond the school gates.

### **The School's Response to the Online Safety Act 2023**

In recognition of the Online Safety Act 2023, the school will:

#### **a. Filtering and Monitoring**

- Maintain robust filtering and monitoring systems to prevent access to harmful or inappropriate content on school devices and networks.
- Conduct regular reviews of filtering effectiveness and respond promptly to incidents.

#### **b. Risk Assessments**

- Assess risks associated with pupils' use of digital technologies, including exposure to illegal or harmful content (e.g. grooming, radicalisation, cyberbullying, pornography, self-harm content).
- Update risk assessments regularly and use them to shape teaching, technical protections, and staff training.

### c. Curriculum and Education

- Deliver a structured programme of digital literacy and online safety within PSHE, Computing, and wider pastoral provision.
- Teach pupils how to identify risks, critically evaluate online information, manage their digital footprint, and know how and where to seek help.
- Ensure pupils understand what constitutes harmful or illegal online content and behaviours, in line with the definitions within the Act.

### d. Staff Training

- Provide annual training for all staff on online safety, with specific reference to the Online Safety Act 2023.
- Ensure the Designated Safeguarding Lead (DSL) and deputies receive advanced training on online harms, incident response, and reporting procedures.

### e. Third-Party Services and Platforms

- Review online platforms, apps, and digital tools used in school to ensure they comply with safeguarding standards.
- Require providers to demonstrate how they manage risks in line with the Online Safety Act.

### f. Incident Management and Reporting

- Record, investigate, and respond to online safety incidents, including any exposure to illegal or harmful material.
- Where appropriate, involve external agencies (e.g. police, CEOP, Local Authority) and follow safeguarding referral pathways.

## Roles and Responsibilities

- **Governors** will oversee compliance with statutory guidance and monitor the effectiveness of online safety arrangements.
- **Head** holds overall responsibility for ensuring online safety is embedded in safeguarding culture.
- **Designated Safeguarding Lead (DSL)** has day-to-day responsibility for online safety, including staff training, incident management, and ensuring alignment with the Online Safety Act 2023.

- **ICT/Network Manager** ensures filtering, monitoring, and technical safeguards are secure, effective, and regularly reviewed.
- **Staff** are responsible for embedding online safety in teaching and pastoral work, and for reporting concerns immediately.
- **Pupils** are expected to engage positively with online safety education, act responsibly online, and report harmful content or behaviour.

## Partnership with Parents and Carers

The school recognises that online risks extend beyond school systems. To strengthen pupils' digital resilience:

- Parents will receive regular communication and guidance on how to keep children safe online, including updates on the Online Safety Act.
- Workshops, newsletters, and online resources will be offered to support parents in monitoring and supporting safe use at home.

## Monitoring and Review

- This policy section will be reviewed annually or sooner if statutory guidance changes or new risks emerge.
- The DSL will monitor incidents, filtering reports, and feedback from staff, pupils, and parents to inform updates.
- The school will adapt practices in line with new codes of practice and regulatory updates from Ofcom under the Online Safety Act 2023.

## Taking Photographs in Schools

1. Good practice guidance from the Information Commissioner's Office on taking photographs in educational institutions will be followed. This is attached for information. In the interests of safeguarding, a common sense approach on a case by case basis will be taken in this area. A full copy of the guidance can be viewed at <https://learning.nspcc.org.uk/online-safety/photographing-filming-children>
2. Our school and its staff will under **no** circumstances photograph injuries seen on children. Staff in schools are not Crime Scene Investigators nor are they trained to the standard of hospital photographers. These experts are the only people who should be photographing injuries. Professional Crime Scene Investigators who undertake injury photographs present their evidence at court as an expert witness. Members of school staff are not expert witnesses.
3. 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. Family Connect professionals will control the process of photographic evidence gathering underway and assessment.
4. We will, as a school, make sure staff should record all visible injuries 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.

### Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Wrekin recognises '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.

## AI

In line with the Department for Education's Generative AI: Product Safety Expectations (2025), our setting recognises the importance of ensuring that any generative AI tools used in school are safe, age-appropriate, and aligned with our safeguarding responsibilities.

We will ensure that:

- AI tools are risk-assessed before use, with particular attention to safeguarding, data protection, and misinformation risks.
- Staff and pupils are educated on the limitations of generative AI, including the potential for bias, hallucinated content, and inappropriate outputs.
- Generative AI is not used for decision-making about individual pupils, especially in relation to safeguarding, behaviour, or SEND provision.
- Children's data and intellectual property are protected, and AI tools are only used in line with our data protection and filtering policies.
- AI-generated content is critically evaluated, and pupils are taught to question the reliability and origin of digital content, including deepfakes and synthetic media.
- Staff are trained to understand the risks and opportunities of AI in education and to model responsible use.

We will only adopt generative AI tools that meet the DfE's safety expectations and will review their use regularly as part of our digital safeguarding strategy

## PART 6: HEALTH AND SAFETY AND THE USE OF REASONABLE FORCE AND PHYSICAL RESTRAINT

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Policies on **Health & Safety** and **Use of Reasonable Force and Physical Restraint** (Part 4 of the school's Behaviour, Rewards and Sanctions Policy) are set out in separate documentation. They reflect the consideration we give to the protection of our children both within the school environment and when away from the school when undertaking school trips and visits. There is separate documentation for **organising and running school trips and visits**.

### Use of Changing Facilities

Where this school considers arrangements for safe changing of children for PE and in respect of recommendations from Serious Case Reviews, this school will consider the NSPCC document 'Best Practice for PE Changing Rooms'. This consideration will come under our duty and remit of Health & Safety and in the context of children's welfare. Any individual school policy stance will take this best practice guidance into account. The guidance includes: what we as a school need to consider when organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations for drama productions (require careful planning and additional thought); and using off-site changing rooms. [NSPCC factsheet](#).

**All staff and pupils should be conversant with the school's separate Games and Sporting Activities Policy and Guidelines which includes Pupils Changing for PE and Games Protocol (reference to changing for drama is also included).**

### Use of Reasonable Force and Physical Restraint

- For the avoidance of doubt for parents and the whole school community: there are circumstances when it is appropriate for staff in school to use 'reasonable force' to safeguard children. 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. For avoidance of doubt reasonable force will only be used where other de-escalation processes have failed.
- The Department for Education believes that the adoption of a 'no contact' policy at a school can leave staff unable to fully support and protect their pupils. 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 within the context of the law and should always depend on individual circumstances (see link below).

#### [Use of reasonable force in schools](#)

- When using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions, this school will consider the risks, carefully recognising the additional vulnerability of these groups. This school will consider our duties under the Equality Act 2010 where we make reasonable adjustments, non-discrimination and the Public Sector Equality Duty. This school will plan positive and proactive behaviour support, for instance by drawing up individual behaviour plans when necessary, for more vulnerable children, and agreeing them with parents and carers. By doing this the school hopes, as far as is possible, to reduce the occurrence of challenging behaviour and the need to use reasonable force. Further information for supporting children with learning disabilities,

autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention will be sought from the government guidance document: [Reducing the need for restraint and restrictive intervention](#).

## PART 7: REPORTING AND RECORDING CONCERNS ABOUT A CHILD RESPONDING TO A CHILD MAKING A DISCLOSURE

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**Safeguarding is the responsibility of ALL members of our community**

### Concerns about a child

The DSL preserves a distinction between children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies.

### What should staff do if they have a concern about a child?

Staff working with children are advised to maintain an attitude of ‘**it could happen here**’ where safeguarding is concerned. If a member of staff has concerns about any child’s welfare or any incident that touches upon safeguarding or child protection issues, he or she **MUST NOT** contact the parents and **THE FOLLOWING PROCEDURE MUST BE FOLLOWED:**

1. The Day-to-day DSL (JSp) should be contacted **immediately**, or in his absence the Supervising DSL (DBI) or a DDP/Cross Trust Safeguarding Adviser (CDF, SM, JSp), or the Head(s).
2. Where possible there should be a conversation with the DSL to agree a course of action.
3. Options will then include:
  - Managing any support for the child internally via the school’s own pastoral support processes;
  - Undertaking an early help assessment; or
  - Making a referral for statutory services, for example, if the child is in need or suffering, or likely to suffer harm. This will involve contacting Family Connect or the local social care
4. Referrals are usually managed by the Day-to-day DSL. However, if in exceptional circumstances the DSL (or any DDP) is unavailable, this should **not delay** appropriate action from being taken. In the case that the DSL or DDP are unavailable, staff should refer any concerns regarding safeguarding or child protection **directly to the Safeguarding Advisors Team via The Family Connect Team on 01952 385385 without delay**. Staff should consider speaking to the SLT as soon as possible after such a referral, if the DSL is unavailable. Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to Local Authority CSC.
5. If anyone other than the Day-to-day DSL makes a referral, they should inform the Day-to-day DSL as soon as possible.
6. A written report should be made (handwritten or via CPOMS) and should include the information revealed by the child using their words as best as possible, when the disclosure was made, to whom the disclosure was made and action taken. See page 32 of this document under ‘Record’.
7. In certain circumstances the Police may need to be called: for example, in known cases of Female Genital Mutilation, which is a criminal offence and where reporting is mandatory.

**See ‘Manage Referrals’ on page 17 of this document, and the flowchart (from KCSIE 2025) in Appendix 8.**

## Data Protection

Data protection fears **MUST NOT** be a barrier to information sharing, as the safety of the child is of the utmost importance. [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.

**Staff should be conversant with the school's Data Protection Policy and Part 7 of this document: Confidentiality of Information and Information sharing.**

## Disclosure – Immediate Response to the Child and Recording

It is vital that our actions do not cause further distress to the child or prejudice an investigation. The priority is to protect the child.

**No member of staff should offer any child confidentiality in matters which could or have affected the child's physical, social, emotional or sexual wellbeing.**

Having made this point it is important to ensure that pupils who have learning difficulties, communication or emotional problems are provided every opportunity and means to express themselves and to do so in a framework characterised by security and support.

<b>R E C E I V E</b>	<ol style="list-style-type: none"> <li>1. DO NOT promise confidentiality. Reassure the child that they have done the right thing, explain whom you will have to tell (the DSL) and why: and, depending on their age, what the next stage will be;</li> <li>2. LISTEN: it is our role to listen not to investigate;</li> <li>3. If you are shocked by what is being said, try not to show it;</li> <li>4. It is fine to observe bruises but not to ask a child to remove their clothing to observe them; DO NOT photograph any injuries;</li> <li>5. The pace should be dictated by the child, without the child being pressed for detail or by asking leading questions such as “what did he/she do next?” or “where did he/she touch you?”</li> </ol> <p><b>TED:</b> ‘Tell me’, ‘Explain to me’ and ‘Describe’.</p>
<b>R E A S U R E</b>	<ol style="list-style-type: none"> <li>6. Reassure the child that they are right to tell and are not to blame;</li> <li>7. Be honest - do not make promises that you cannot keep such as “I’ll stay with you all the time” or “it will be all right now”;</li> <li>8. Try to alleviate feelings of guilt by saying, “You are not to blame”</li> <li>9. Acknowledge how hard it must have been for the child to tell you.</li> <li>10. Be careful not to burden them with guilt by asking “why didn’t you tell me this before?”</li> </ol>
<b>R E A C T</b>	<ol style="list-style-type: none"> <li>11. Do not ask leading questions.</li> <li>12. Let the child tell you what they want to and no more;</li> <li>13. Use open questions such as “is there anything else you want to tell me?” or “yes?” or “and?”</li> <li>14. Accept what the child says.</li> <li>15. Do not criticise the alleged perpetrator, the child may have warm feelings for them, but merely wish any abuse to stop;</li> </ol> <p><b>Following the disclosure:</b></p> <ul style="list-style-type: none"> <li>• When the child has finished make sure they feel secure;</li> </ul>

	<ul style="list-style-type: none"> <li>• Explain what you are going to do next;</li> </ul> <p>The welfare of the child is paramount. <b>Contact one of the designated persons immediately if you feel that the child should not be left alone</b>; he or she will ensure that the child is looked after.</p> <ul style="list-style-type: none"> <li>• Record the disclosure – see below</li> <li>• Inform the DSL or a DDP <b>straight away</b>.</li> </ul>
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<b>R E C O R D</b>	<p>16. Make some brief handwritten notes at the time or immediately afterwards. Afterwards, notes can be made via CPOMS. Record the date, time, place and context of disclosure or concern, recording facts, who you shared them with and not assumption, supposition or interpretation;</p> <p>17. Record where you spoke with them and personal safety details such as ‘I discussed the incident with the child in the Deputy Head’s office with the door open’ or justify if it were closed, but naming those who you told this to be the case. If alone, reason that rationale stating ‘the child stated they would only confide in me if I was alone’;</p> <p>18. If you observe bruising or an injury try to record detail, e.g. ‘right arm above elbow’, ‘bruise noticed on outside of upper left thigh’; if recording on CPOMS, use the body maps to approximate sites of any injuries described;</p> <p>19. Note the non-verbal behaviour and the key words in the language used by the child (try not to translate into ‘proper terms’ ensuring that you use the child’s own words). Body language should be noted and support any disclosure.</p> <p>20. All records must be passed on to the DSL for storage and action, either as handwritten notes or via CPOMS;</p> <p><b>21. It is important to retain on file any signed original handwritten notes; these must be passed on to the DSL, who may ask you to complete a Family Connect Safeguarding Team referral form.</b></p>
<b>S U P P O R T</b>	<p>22. Get some support for yourself, without disclosing confidential information about the child to a colleague(s). Receiving a disclosure can be an upsetting experience. The DSL will help you to find the support that you need.</p>

**The member of staff may now withdraw from the immediate process but should remain vigilant.**

It is not appropriate to talk to the child or to support further. However, when a pupil has trusted a member of staff enough to disclose, they may feel the desire to return to talk (remember that investigations can sometimes take months). In such a situation they should be told that you cannot comment or advise, as to do so may affect their security and safety both in the short and long term – however, you can listen.

Any discussion could be misused in court by the defence lawyers as evidence against the teacher and the child.

Parents of a child who has made a disclosure may be contacted directly by the DSL or in their absence, DDP or another member of the SLT. Staff must not discuss disclosures with parents unless specifically authorised to do so by the DSL.

**Any difficult situations must be referred to the DSL immediately.**

See also **Appendix 6**: Advice when answering questions and confidentiality policy.

## Early Help

If early help is appropriate, the DSL (or a DDP) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Our early help offer is aligned with the expectations of Working Together to Safeguard Children 2023, ensuring that children and families receive the right support at the right time. We use the Telford & Wrekin Threshold Guidance to inform our decisions and work collaboratively with partners to deliver integrated support.

We ensure that all children that disclose that they have taken an overdose go to the Emergency Department at the nearest hospital to be checked by a medical professional in line with the [TWSP Procedure for the management of overdoses, involving children within schools and colleges](#).

**Where a child is suffering, or is likely to suffer from harm, we will make a referral to CSC (and if appropriate the police) immediately.**

### Statutory Children's Social Care (CSC) Assessments and Services

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 abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

CSC assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Additional information is available here: [Contextual Safeguarding](#). Contact details for referrals are in Appendix I of this document.

## Young carers

1. Legislation defines a 'young carer' as '...a person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work).' A young carer might look after someone because they are sick or have a disability or

mental health issues. Or, if a parent or family member has an alcohol or drug problem, they may be unable to care for themselves or anyone else.

2. We recognise the responsibilities of young carers are wide and varied but can include:
  - practical tasks, such as cooking, housework and shopping;
  - physical care, like helping someone out of bed;
  - emotional support, including talking to someone who is distressed;
  - personal care, such as helping someone dress;
  - managing the family budget and collecting prescriptions;
  - helping to give medicine;
  - helping someone communicate, and
  - looking after brothers and sisters.
3. Caring for someone can be very isolating, worrying and stressful for children. For young carers, this can negatively affect their experience in education. We recognise that many young carers will regularly miss school/college and that this can have a lasting effect on their life chances.
4. Our aim is to work with families and other agencies to identify young carers to ensure that their needs are assessed and where necessary supported. We will work with the [Telford and Wrekin Young Carers Service](#) to do this.

## Unconfirmed Worries About Possible Child Abuse

1. Very often members of staff have unconfirmed worries about pupils, but little real evidence, and so feel unsure about how to proceed. Many cases have shown that these unconfirmed worries are in fact the tip of the iceberg; that if information from one member of staff was placed alongside that of another professional then there may be a serious cause for concern.
2. It is therefore vital that even vague 'worries' are passed on at the **earliest stage** to the designated members of staff who are in a position to evaluate the information and to involve other agencies as appropriate.
3. Incident sheets should be completed with staff clearly identifying what is fact and what is opinion.
4. Any unconfirmed worries should be recorded on an Incident Report Form (handwritten or via CPOMS). All incidents, suspicions or concerns should be recorded, dated (and signed if handwritten) and passed on to the DSL.

## Appendix 8: KCSIE 2025 flow chart setting out the process for staff when they have concerns about a child.

## Support for all Children - The Role of Designated Staff

1. Any child identified with extra vulnerability in their lives are prone to more peer group isolation than other children. They will be made aware of the school's pastoral/school counsellor's work and offered access to that or any other appropriate service if needed and offering extra support if required. Especially vulnerable are the areas of Special Educational Needs (SEN), Care Leavers, Children with a Disability, Children in Care and those experiencing any form of abuse.
2. The DSL and along with any of the school's DDPs will also have any details of the local authority personal advisors so that they can assist within the setting and onto transition. The DSL will

liaise with the appropriate person when the child leaves the school's setting, sharing full information as relevant.

3. Recognition that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child may feel self-blame and we will ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
4. Recognition that the school may provide the only stability in the lives of children who have or who are at risk from harm. The school community will therefore establish an ethos where children feel secure and are encouraged to talk and are always listened to.
5. Acceptance that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. We will ensure PSHE curriculum opportunities which equip children with the skills they need to stay safe from harm.
6. Our policy on bullying, child-on-child abuse and racist incidents is set out in separate documents and acknowledges that to allow or condone bullying or racism may lead to consideration under child protection procedures. These will be documented like all other incidents. Any bullying whether racist, emotional, physical, sexist, homophobic, extremist, cyber or in any other forms will not be tolerated under any circumstances.

## **Children Potentially at Greater Risk of Harm**

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

- Children may need a social worker owing to safeguarding or welfare needs. Children may need this help owing 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 a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.
- Where a child needs a social worker, this should 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 provision of pastoral and/or academic support, alongside action by statutory services).

### **Children who are absent from Education / Elective Home Education (EHE)**

We believe children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. Our response to persistently absent pupils and children absent from education will support identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child absent education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

The recognised figure for severely absent is 50% or less and persistent absence is being less than 90%, although concerns may still be raised if above this. 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 all pupils who are absent from education and policies and procedures for

pupils on a modified timetable (available from Telford & Wrekin Council). We recognise that pupils who are not accessing full time education are at greater risk of abuse, neglect and exploitation than other children. We therefore aim to reduce the number of pupils accessing a modified timetable. We will ensure any pupils accessing a modified timetable are seen regularly by school/college staff to help to ensure their safety and welfare. It is our aim that pupils access modified timetables for the limited periods of time and children who on a child protection, child in need plan and/or have an Education Health Care Plan are not placed on a modified timetable. We will regularly monitor and review the use of modified timetables.

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 absent from education and poses a potential welfare/safeguarding concern. Where a child is on a Child Protection Plan has been absent from school for two consecutive days, we will notify the child's allocated social worker.

All staff should be aware that children being absent from education for prolonged and/or repeat occasions, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include neglect, sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to Local Authority CSC and need a social worker (such as a child who is a Child In Need or who has a Child Protection Plan, or is a Looked After Child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- Guidance on school attendance [Working together to improve school attendance](#) including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#).
- General information and advice for schools and colleges can be found in the [Government's Missing Children and Adults Strategy](#).

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

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

## Children Missing from Education (CME)

The school recognises the increased safeguarding risks associated with children missing from education. As highlighted in *KCSIE 2025* (p.57), children absent from school, particularly on repeat occasions, may be vulnerable to exploitation, criminal activity, radicalisation, trafficking, or forced marriage.

Staff must:

- Report all unexplained or repeated absences to the DSL without delay.
- Record concerns and liaise with the DSL about potential safeguarding risks.
- Be alert to contextual factors, including patterns of absence that could indicate wider safeguarding concerns.

The school will maintain close contact with the Local Authority to ensure timely referrals for pupils missing education.

## Children requiring mental health support

- Wrekin has an important role to play in supporting the mental health and wellbeing 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 school works closely with parents and outside agencies to identify those pupils who may need additional mental health support.
- Members of staff communicate concerns to the safeguarding team.
- The Special Circumstances Register identifies those pupils who are in need of additional mental health support: staff are asked to regularly read this working document as it is subject to change.
- Members of staff are informed if the school is made aware a child is in need of additional support.
- The DfE has published these two documents as guidance: [Preventing and Tackling Bullying](#) and [Promoting and Supporting Mental Health and Wellbeing in Schools](#) ; these set out how schools can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing. Wrekin has many strands to the teaching of these aspects (see Part Four, above), including our whole-school 'R Mentality' approach.
- The DfE has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience and mental health. This sits alongside their [Wellbeing for education recovery](#) program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.
- In addition, Public Health England has produced a range of resources to support secondary schools to [promote positive health, wellbeing and resilience](#) among children. See [Rise Above](#) for links to all materials and lesson plans, including social media, forming positive relationships, smoking and alcohol.

## Mental Health First Aid Training

- There is a rolling programme of MHFA training for other key personnel.
- It is the intention to train the new Nurse Manager to be a MHFA trainer.
- Whilst the Senior Deputy Head (Pastoral) holds the role of Mental Health Lead, Wrekin has a Director of Wellbeing and a Chaplain, who also play significant roles (and are well trained) in supporting the mental wellbeing of pupils (and indeed colleagues).

## Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The DSL will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker in the authority that looks after the child.

A previously Looked After Child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously Looked After Children safe. When dealing with Looked After Children and previously Looked After Children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

## Children with special educational needs and disabilities or physical health issues

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. As a result, additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

The addition of the SENCO/Head of Support for Learning to the Safeguarding team (as Day-to-day DSL) has been driven by the need to consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Further information can be found here: [SEND Code of Practice 0 to 25 and Supporting Pupils at School with Medical Conditions](#). [Mencap](#) represents people with learning disabilities, and have specific advice and information for people who work with children and young people

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

In line with KCSIE 2025, we take a cautious and proportionate approach to supporting gender questioning children. We will work in partnership with parents (unless doing so would place the child at risk), and consider clinical advice and wider vulnerabilities, including mental health and safeguarding risks.

The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Staff at Wrekin should endeavour to reduce additional barriers faced, and provide a safe space for children to speak out or share their concerns with members of staff. The Wrekin Pride Club in particular gives LGBT pupils a safe space to converse with their peers as well as staff on related matters.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

When supporting a gender questioning child, we will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children who are lesbian, gay, or bisexual lack a trusted adult with whom they can be open. All staff will endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff. Our RSHE curriculum includes content on equality, respect for others, and the law. It is inclusive of all pupils and reflects the diverse backgrounds and identities of our school community, including those who are LGBT. This is in line with the RSHE Statutory Guidance (2025) and the Equality Act 2010.

## Legal Definition of Sex and Equality Act Compliance

1. In line with the UK Supreme Court judgment (*\*For Women Scotland v The Scottish Ministers\**, 2024) and the Equality and Human Rights Commission's interim guidance (April 2025), we recognise that under the Equality Act 2010, the protected characteristic of "sex" refers to 'biological sex.' **This means:**
  - A "woman" is a biological female.
  - A "man" is a biological male.
  - A person who identifies as transgender does not change their legal sex for the purposes of the Equality Act, even if they hold a Gender Recognition Certificate.
2. We will ensure that our safeguarding, curriculum, facilities, and equality practices reflect this legal definition. Where single-sex services or spaces are provided, decisions will be made in accordance with the Equality Act 2010 and relevant statutory guidance, with due regard to the safety, dignity, and privacy of all pupils. We will continue to support all pupils with sensitivity and respect, while ensuring compliance with our legal duties under the Equality Act 2010.

## Gender questioning children

In line with *KCSIE 2025* (para 203, p.54), the school recognises that some children may be exploring their gender identity. Safeguarding remains our first priority in all such cases. The school will:

- Respond with sensitivity and respect, ensuring the child feels listened to and supported.
- Balance safeguarding duties with wider statutory requirements, including equality, data protection and parental rights.
- Involve parents and carers wherever possible, unless doing so would place the child at risk of harm.
- Liaise with external agencies where appropriate, including children's social care and health professionals.

All staff are expected to maintain professional curiosity and to record and share any safeguarding concerns with the DSL promptly.

## **PART 8: SAFEGUARDING AND CHILD PROTECTION RECORDS, CONFIDENTIALITY OF INFORMATION, SHARING OF INFORMATION AND COMMUNICATION WITH PARENTS**

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### **Records**

All members of staff are required to record accurately information that might be required in respect of child protection.

**Records are not to be kept in the child's normal record file and should either be recorded on CPOMS or passed to the DSL.**

### **Record Keeping**

1. All physical records are retained in a 'Child Protection' file, separate from the child's main file. This is securely locked away on the premises and only accessible to the Designated Persons. Electronic records will be held securely on CPOMS (also only accessible to the Designated Persons).
2. The policy for record keeping has been to chronologically record handwritten concerns on a confidential file, including details of dates, times, staff involved and action taken. Handwritten notes are never discarded unless transferred to electronic means, at which point they are disposed of securely (shredded). With the introduction of CPOMS more electronic records are being kept, with automatic recording of dates and times on the system. We follow the guidance in Annex C of KCSIE 2025 regarding the secure transfer, retention, and review of child protection records. All safeguarding records are reviewed annually and transferred securely when a child moves to another setting.
3. Copies of email streams are also useful additions, which can clearly document sequential action. Again, these would be used alongside handwritten notes or pertinent information copied and pasted into CPOMS incident records and action trails; these are by no means be regarded as a substitute for action. If staff are alerting a colleague to a concern, then it is preferable to mark the child's record 'see JSp/DBI for further information' or to alert JSp/DBI via the function within CPOMS.
4. The records are reviewed termly by the DSL and checked to be chronological, tidy, legible (where appropriate as in the case of a child disclosure in writing) and (where appropriate) factual in content, as records may sometimes be immediately required by professionals.
5. Withdrawal of a record(s) from the school by a Designated Person will be noted and signed for, as will files released to professionals, such as the group solicitor, Child Protection/Safeguarding, LADO, NSPCC or police.
6. 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.
7. If in any doubt we will seek advice from the school's Data Protection Officer: Pete Stanway.
8. Upon releasing records, the school will request ID Badges for release.
9. No named statistics in relation to child protection are a part of performance information. The DSL will inform the Head(s) and the governing body of how the school is coping with child protection issues on a regular basis.

10. The school reserves the right to withhold files where it deems it appropriate in the best interests of the child. In such cases the school will seek advice from TWSP.

**In cases of alleged child abuse which come to court**, child protection records may be required by the court. Information required by the court should be given to the officers of the court and not to other persons who may use it as evidence. It is not necessary for other background information on the child to be released; this can only be done with parental permission.

**In all cases which involve the death or serious harm to a child when abuse is confirmed or suspected**, the Local Safeguarding Partnership will require swift response to requests for information from all agencies including schools. Records must be made available to the Case Review Committee – this further emphasises the need for precise and secure keeping of records. In addition, interviews within the Education department involving key personnel may be required, in order to assess the quality of decisions made and actions taken.

### **When a Child Transfers to Another School or College**

1. If a child subject to a Child Protection Plan is deemed at risk, the child's key worker within CSC will be contacted by the DSL.
2. When a child changes school within or outside the authority, all child protection records will be passed onto the DSL of the next educational setting by the current DSL or Head(s), or to CSC within the authority if the child is transferring to another authority.
3. The DSL, if thought appropriate, may wish to share relevant safeguarding information in advance of new children arriving if they need continuing support e.g. in response to sexual abuse.
4. Wrekin, in this process, **will not** photocopy and retain child protection records as this is deemed from the Information Commissioner's Office that this would contravene The Data Protection Act 2018 (DPA 18), but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes. This would be deemed as best practice. We will follow [Telford & Wrekin Workbook Guidance](#) in all circumstances where we need to or seek advice from our Data Protection Officer.
5. **The school will ensure:**
  - That the new school receives all the necessary information relating to that child as soon as possible (ideally a child protection file should be transferred to the new school or college within five working days of the child starting their new school or college);
  - That the child protection file is transferred separately from the main pupil file;
  - Secure transit of the child protection file;
  - That it has received written acknowledgement of the safe transfer of any child protection documents (see Appendix 9 of this document);
  - The DSL shares information with the new school or college in advance of a child leaving where appropriate, e.g. information that would allow the new establishment to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.
6. The school will inform the local authority when a child of compulsory school age leaves the school (in line with the Education (Pupil Registration) (England) Regulations 2006) or is enrolled at the school at

non-standard transition times. See Appendix I for contact details.

## Retention of Children's Files

### All schools must keep educational records on their children. These should include:

- Copies of the reports which have been sent to parents/carers on the child's achievements, as well as other records about those achievements;
- Exchanges of non-routine correspondence between parents and the school;
- Any information the school has on the child's education from the local authority;
- Any statement of special educational needs;
- Any personal educational plan.

There may be other records kept like details of attendance, exclusions, behaviour and family background. This is not compulsory but would be viewed as 'best practice'. The educational record does not include the notes that a teacher makes for his or her own use.

### The Child Protection File is a separate file to the educational records

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 shredded or incinerated. The school will follow Telford & Wrekin Workbook Guidance in all circumstances where we need to.

Further information is available via: [www.education.gov.uk](http://www.education.gov.uk) and [www.direct.gov.uk](http://www.direct.gov.uk)

## Confidentiality of Information

All staff at Wrekin should be conversant with the school's Data Protection Policy.

**Data protection fears** MUST NOT be a barrier to sharing (or withholding) information, as the safety of the child is of the utmost importance.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff should seek advice from a Designated Person, or the school's Data Protection Officer or outside agency as required.

- a. If abuse is suspected, information should be given directly to a Designated Person(s) for child protection or, in their absence, to another member of the Senior Leadership Team.
- b. The personal information about all families is regarded by those who work in this school as confidential. All staff need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality in all areas of the school.
- c. Staff should understand they need to know only enough to prepare them to act with sensitivity to a child and to refer concerns appropriately. It is inappropriate to provide all staff with detailed information about the child, the incident, the family and the consequent actions.
- d. Members of staff have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies.
- e. If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the welfare of that child.

- f. Within that context, the child should however be reassured that this will be shared on a “need to know” basis. 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.
- g. The Head(s) or Designated Persons will disclose any child protection information about a pupil to other members of staff on a need to know basis only.
- h. Further details on information sharing may viewed:
  - At [Information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)
  - In [Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR](#)

Whilst adhering to the principle of limiting the spread of information to the minimum number of people, at Wrekin all staff closely involved with a child, for whom there are child protection concerns, should know about the child’s circumstances, as it may affect practical matters such as:

- Who meets the child from school;
- Who gives permission to go on school outings and educational visits;
- Who attends parents’ evenings;
- Who should or should not share a room at the school or on a trip;
- Who receives communications from school regarding the child.

Boarding, teaching, support assistants, therapy and visiting medical staff may all attend child protection conferences where they are likely to hear detailed information about family circumstances and abusive incidents. They may also receive minutes that record these meetings. Particular care is necessary to maintain the confidentiality of such information whilst ensuring that the issues that may impact upon the child’s life are communicated to all relevant staff.

Staff, unless directly asked and supervised, should never raise with a child, information to which they have had access. The child’s or young person’s feelings should be paramount and many prefer staff not to know about traumatic events in their lives. The importance of discretion in the handling of such information cannot be overstated. Any infringement of this policy, for example by inappropriate discussion in inappropriate settings or the sharing of confidential information for a purpose not sanctioned by the school will be regarded as a serious breach of professional conduct and would lead to disciplinary action against the members of staff concerned.

## Sharing of Information

Staff will be told in their separate team meetings of present child protection concerns that impact on their work. This will be the duty of the DSL. Such updates will take place on a termly basis or as a new concern is identified.

Child protection issues will be on the agenda of staff meetings.

Access to the detailed child protection files will be through the DSL. Requests for access should be limited to those staff that have a direct involvement with the pupil and need to know more about the circumstances.

Should the school's Day-to-day DSL be subject to allegation or suspicion then the Supervising DSL will take over the role of DSL. If the Supervising DSL is subject to allegation or suspicion then the Head(s) will take over the role of the DSL.

## Communication - Parents

- a. The school will ensure that parents have an understanding of the responsibility placed on the school and staff for child protection and safeguarding young people.  
A child protection statement is included in the school's Parent Handbook. The school's Safeguarding and Child Protection Policy is published on the school's website.
- b. Parents play an important role in protecting their children from abuse. The school is required to consider the safety of the child and should a concern arise, professional advice will be sought prior to contacting parents.
- c. If deemed appropriate, parents will be contacted and the school will continue to work with the parents to support the needs of their child. Gaining consent from the parents will be sought, although parental consent is not required before making referrals to statutory agencies.
- d. The DSL (or in the DSL's absence a DDP) will undertake appropriate discussion with parents prior to involvement of another agent unless the circumstances preclude this. Parents should generally be consulted before a referral is made about them to another agency but there are certain circumstances when this is not the case. Staff must seek guidance if they are unclear as to whether they should discuss a concern with parents.
- e. The school takes seriously its duties to assist parents and help them with online safeguarding resources. As such, we will make them aware of the web page **Parent Info** which is a comprehensive, free resource for schools and parents covering a range of safeguarding topics and information about apps and when they are updated etc. The content is updated by CEOP (Child Exploitation & Online Protection Centre) and can be found at:  
<https://www.ceop.police.uk/safety-centre/>
- f. Parents that may have concerns regarding a member of staff can in the first instance raise those with the Head(s), the DSL or Governing Body for further exploration. This may involve sharing those concerns with the relevant agencies. Where the parent may have concerns regarding the Head(s), the Chairman of Governors should be contacted.
- g. Parents can liaise with the Independent Schools Inspectorate (ISI) on such conduct issues or regulatory concerns; advice can be found on its website [www.isi.net](http://www.isi.net) or contact can be made direct to ISI. See Appendix I for contact details. Concerns may be copied to the Department for Education (DfE).
- h. On occasion, ISI may forward complaints that **may** 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 ISI on a case by case basis. We wish to make it clear that there is a separate standalone formal school Complaints Policy and Procedures which can also be used to raise concerns of any nature, please see the schools website for familiarisation of that route. **We would hope that the need to elevate those concerns is a rare occurrence but for transparency we wish to make it clear that that route is available for parents. Parents can also speak to the Head(s)/Governing Body if clarification is needed.**
- i. If concerns relate to bullying or possible child abuse then, in addition to ISI and/or DfE, parents can contact the Safeguarding Team Helpdesk: see Appendix I for contact details.
- j. If concerns are related to a child protection issue, parents can contact ISI: see Appendix I for contact details.

- k. We will keep parents informed in all areas of safeguarding and child protection through regular methods of interaction such as parents' meetings, newsletters and parents forums.
- l. We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely from us. In relation to this we understand that on some occasions tensions can run high where safeguarding concerns arise and need to be discussed, but for the safety of all we wish to remind parents that although schools are fulfilling a public function, schools are private places. The school will therefore act to ensure they remain a safe place for pupils, staff and other members of the community. The public has no automatic right of entry. The same principles of safety will apply to social media issues where we will **expect parents to talk to school in the first instance, before taking to social media to express their thoughts.**

We aim to help parents to 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. In line with Working Together to Safeguard Children 2023, we aim to build positive, trusting, and co-operative relationships with parents and carers. We recognise that effective safeguarding is most successful when families are engaged as partners in the process of support and protection. In line with RSHE statutory guidance, we are transparent with parents about the content of our RSHE curriculum. Parents have the right to request withdrawal from sex education (but not relationships or health education), and we will work in partnership with them to address any concerns. We also ensure that any external agencies or resources used in RSHE are carefully vetted and align with our safeguarding principles. The governing body will include a child protection statement in our prospectus and all parents can view a copy of this policy.

Parents can liaise with the Independent Schools Inspectorate (ISI) on such conduct issues or regulatory concerns, advice can be found on its website <https://www.isi.net/parents-and-pupils/concerns-about-a-school> or contact can be made direct to ISI, you can email [concerns@isi.net](mailto:concerns@isi.net) or call 020 7600 0100 and ask to talk to an appropriate member of staff.

## **Barring from the School Premises (from the school's Complaints Policy)**

'Although fulfilling a public function, schools are private places. The public has no automatic right of entry. Schools will therefore act to ensure they remain a safe place for pupils, staff and other members of the community'. DfE Best Practice Advice for School Complaints Procedures - January 2016

However unlikely the scenario is, if a parent's behaviour is a cause for real concern, the school will ask them to leave the school premises. In serious cases, the Head(s) can notify them in writing that their implied licence to be on school premises has been temporarily revoked subject to any representations that the parent may wish to make. The school will give the parent opportunity to formally express their views on the decision to bar in writing.

The decision to bar will then be reviewed, taking into account any representations made by the parent, and either confirmed or lifted. If the decision is confirmed the parent will then be notified in writing, explaining how long the bar will be in place.

Anyone wishing to complain about being barred can do so, by letter or email, to the Head(s) or Chair of Governors. However, complaints about barring cannot be escalated to the DfE. Once the school's own complaints procedure has been completed, the only remaining avenue of appeal is through the Courts; independent legal advice must therefore be sought.

The content above has been adopted by this school from Department of Education advice '**Best Practice Advice for School Complaints Procedures 2016**' (updated March 2021).

## PART 9: ALLEGATIONS AND DISCLOSURES AGAINST STAFF OR VOLUNTEERS AND PUPILS

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The process of managing allegations against those who work with children can be viewed on <http://westmidlands.procedures.org.uk/> Section 1.14 'Allegations against Staff or Volunteers'.

Wrekin has internal procedures and processes in place for dealing with allegations and will follow TWSP policy and procedures.

We will adhere to Part Four of KCSIE September 2025 'Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors'.

This school believes that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate Code of Conduct policy is in place for staff and governors. Staff should refer to this Code of Conduct to ensure they are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviours, in themselves and others.

[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 those that work with children. We will make all those in the school community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

Staff must protect themselves and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. It is important not to touch pupils, however casually, in ways or on parts of the body that might be considered indecent.

**Under the Sexual Offences (amendment) Act 2000**, it is an "abuse of a position of trust", and thus a criminal offence, for a member of staff at a school to engage in sexual activity with a pupil aged under 18.

**Any concerns under this heading must be referred to the DSL.**

The school understands that a pupil may make an allegation of abuse against a member of staff.

The school has procedures for dealing with allegations against staff that aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations.

## Determination of level of concern

At Wrekin we encourage an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. We hope this should enable the identification of concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that all adults working in or on behalf of the school are clear about professional boundaries (encouraging them to act within these boundaries and in accordance with the ethos and values of the school).

### A: Low level concerns

Wrekin College will use the following processes to manage and record any concerns (including allegations) which do not meet the harms threshold (see part B, below), and will take appropriate action to safeguard children.

Concerns may arise in several ways and from a number of sources, for example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken.

The term 'low level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the harms threshold (see below). A low level concern is **any concern** – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

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

Examples of such behaviour could include (but are not limited to): being over friendly with children; having favourites; taking photographs of children on their mobile phone; engaging with a child on a one-to-one basis in a secluded areas or behind a closed door; or using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless; behaviour that may look to be inappropriate, but might not be in specific circumstances; through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (see below), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

### Reporting of low level concerns

Low level concerns about a member of staff, supply staff, volunteer or contractor should be reported as per section 2 'Reporting' below (and as set out in Part one of KCSIE 2025), in the same way as allegations of a more serious nature, allowing the Head(s) and DSL (as long as the concern/allegation is not concerning them) to determine the level of concern being raised and therefore to deal with the concern in the most appropriate manner. Low level concerns should be reported to the DSL, who will inform the Head(s) in a

timely fashion of the nature of the low level concern. The Head(s) will be the ultimate decision-maker in respect to low level concerns, but he may consult with the DSL depending on the nature of the concern raised.

Reports about supply staff and contractors should be made to the DSL, who will notify their employers, so any potential patterns of inappropriate behaviour can be identified.

If there is any doubt as to whether information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, then the DSL or Head(s) will consult the LADO.

### **Recording of low level concerns and References**

All low-level concerns will be recorded in writing, including details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted; the wish of an individual to remain anonymous will be respected as far as reasonably possible. These records will be kept confidential, retained securely, and will comply with UK GDPR. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school will decide on a course of action, either through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies might be revised or extra training delivered to minimise the risk of it recurring.

The school is likely to retain such information until the individual leaves our employment. However, low level concerns will not be included in references, unless they relate to issues which would normally be included in a reference, for example misconduct or poor performance. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it would be referred to in a reference.

### **Responding to low level concerns**

If the concern has been raised via a third party, the Head(s) will collect as much evidence as possible by speaking: directly to the person who raised the concern, unless it has been raised anonymously; to the individual involved and any witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded, along with the rationale for their decisions and action taken.

## **B: Allegations that may meet the harms threshold**

**The school will follow guidance in Part Four of KCSIE September 2025 where a concern includes an allegation that might meet the harms threshold.**

The school will manage all cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. We will act on allegations if a teacher or member of staff (including volunteers, supply staff and contractors) in our school has:

- a. Behaved in a way that has harmed a child, or may have harmed a child; and/or
- b. Possibly committed a criminal offence against or related to a child; and/or
- c. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or

- d. Behaved or may have behaved in a way that indicated they may not be suitable to work with children. This final bullet point includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children; this is known as **transferable risk**. For example, if a member of staff is involved in domestic violence at home. Even if no children were involved, the school would still need to consider what triggered these actions and whether a child in the school could trigger the same action, therefore be potentially put at risk. Where appropriate, an assessment of suitable risk to children with whom the person works will be undertaken, with advice sought from the local authority designated officer (LADO) if need be.

## Low-Level Concerns About Staff

In line with *KCSIE 2025* (p.79), the school maintains a clear distinction between:

- **Allegations that meet the harm threshold** (where a child has been harmed, may have been harmed, or where a person poses a risk of harm to children), which will be managed in accordance with statutory procedures and reported to the LADO.
- **Low-level concerns**, which are behaviours that do not meet the threshold but may be inconsistent with the standards expected of staff. Examples include unprofessional conduct, overfamiliarity, or breaches of the staff code of conduct.

All low-level concerns will be:

- Reported to the Head(s) or DSL.
- Recorded in writing, reviewed regularly, and monitored for patterns.
- Addressed in a timely and proportionate manner, ensuring a culture of openness and transparency.

## Non recent allegations

Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with CSC and the police. Abuse can be reported no matter how long ago it happened.

### 1. Whistleblowing

- The school recognises that pupils cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. This duty is outlined in the separate Whistleblowing policy.

**A person who in good faith reports significant concerns, allegations or suspicions of circumstances, situations or the behaviour of others which is likely to put a child's safety or welfare at risk will never be victimised following their disclosure.**

### 2. Reporting

The school has internal procedures and processes in place for dealing with allegations and will follow TWSP Policies and Procedures.

**Allegations or concerns are reported without delay in the following way:**

- a. **Safeguarding concerns or allegations against staff, including the DSL, Designated Persons and volunteers** must be reported to the **Head(s)** ('case manager'), who will liaise with the Local Authority Designated Officer (LADO) through Family Connect;
- b. **Safeguarding concerns or allegations against the Head(s) or any adult member of their families** must be reported to the **Chair of Governors** ('case manager'), who will liaise with the Local Authority Designated Officer (LADO) through Family Connect.

**The Head(s) and the Chair of Governors ('case manager') must consult with the DSL so long as the allegation is not concerning them.**

**In the absence of the Head(s), reports should be made to the DSL, or if the allegation is against the DSL, to the Chair of Governors (not another member of the school's safeguarding team).**

The above procedure **MUST BE** followed.

Where the school identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the case manager will contact CSC and, as appropriate, the police immediately (as per the processes explained in Part one of KCSIE 2025).

**There are two aspects to consider when an allegation is made:**

- **Looking after the welfare of the child** – the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority's CSC, as described in Part one of KCSIE 2025. If there is cause to suspect a child is suffering, or is likely to suffer, significant harm, a strategy discussion involving the police and/or CSC will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#).

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to CSC.

- **Investigating and supporting the person subject to the allegation** – when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. As an employer, Wrekin College will offer appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and will not ordinarily be shared with other staff or with children or parents not directly involved in the investigation. In addition to the points outlined in the procedure below (point 3), the school: will advise the individual to contact their trade union representative, or a colleague, for support; will provide access to counselling or medical advice where appropriate; will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Whilst the LADO and the police can advise, ultimately the power to suspend is vested in the governing body (who are the employers). This decision will be taken on a case-by-case basis, having undertaken a risk assessment about whether the person poses a risk of harm to children. Suspension is not the default position: an individual will be suspended **only** if there is no reasonable alternative. The case manager will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false. In many cases, an inquiry can be resolved quickly and without the need for suspension.

If immediate suspension is considered necessary, the case manager will record the rationale and justification for such a course of action. This will also include what alternatives to suspension have been considered and why they were rejected. Where it has been deemed appropriate to suspend the person, written confirmation will be given within one working day, giving as much detail as appropriate for the reasons for the suspension. The person will be informed at the point of suspension who their named contact is within the organisation and provided with their contact details.

If the school were to be made aware that the Secretary of State has made an **interim prohibition order** in respect of an individual who works at Wrekin College, we would take immediate action to ensure the individual does not carry out work in contravention of the order. This means that, pending the findings of the TRA investigation, the individual **must not** carry out teaching work.

**ALL allegations MUST be referred to the Local Authority Designated Officer (LADO) for advice BEFORE any investigation takes place.**

In the case of serious harm, and/or if a crime has been committed, the Police **MUST** be informed from the outset. The school **MUST NOT** undertake its own investigation of an allegation without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

**The school MUST NOT require parental consent before reporting allegations to the LADO.**

We will liaise with our HR Department to provide support to staff going through the disciplinary and LADO investigative process. This will support referrers, investigators and those affected in any such dealings.

### **If a pupil makes an allegation against a member of staff**

If a pupil makes an allegation against a member of staff the procedure outlined below must be followed. In addition, note the following:

- No discussion with any other member of staff should take place;
- The child must not be questioned beyond establishing the points she/he wishes to make;
- The Head(s) should be informed as soon as possible after the disclosure has been made;
- The Head(s) will liaise with the LADO.

To avoid potential allegations and for the safety and welfare of pupils and the protection of staff, we have made classrooms highly visible places where easy viewing is possible. Therefore, the masking of windows is not allowed and is treated as a health and safety issue for all. There may be exceptional

circumstances where masking of windows is needed and justified, for example for the teaching of drama. In these cases the Head(s) will make a judgement on a case-by-case basis.

If an allegation is made against a teacher, the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated.

### **3. Procedure to be followed when allegations of abuse are made against a member of staff (teaching or non-teaching)**

**The Head(s) or (where the Head(s) or an adult member of his family is the subject of the allegation, the Chair of Governors) (hereafter referred to as the ‘case manager’) will:**

1. Discuss the allegation immediately with the LADO by contacting Family Connect.
2. The purpose of the initial discussion is for the LADO and case manager to consider the nature, content and context of the allegation and agree on a course of action.
3. The case manager will provide or obtain relevant information as requested by the LADO. In some situations, the case manager may consider it appropriate to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the LADO in order to help determine whether police involvement is necessary.
4. The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by the case manager. The case manager will reach an agreement with the LADO on what information should be put in writing to the individual concerned and by whom. The case manager will then consider, with the LADO, what action should follow both in respect of the individual and those who made the initial allegation.
5. The case manager will inform the accused person about the allegation as soon as possible after consulting the LADO. The case manager will provide them with as much information as possible at that time. However, where a strategy discussion is needed, or police or CSC services need to be involved, the case manager will not do this until those agencies have been consulted, and have agreed what information can be disclosed to the accused. We will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. We will explore all options to avoid suspension prior to taking that step. Suggestions as to potential alternatives to suspension for staff under investigation are outlined in part 4, KCSIE 2025.
6. The school will consider options where an investigation by the police or CSC services is unnecessary, or the strategy discussion or initial evaluation decides that is the case. The case manager will discuss the next steps with the LADO. In those circumstances, the options open to us depend on the nature and circumstances of the allegation and the evidence and information available.
7. This will range from taking no further action to dismissal or a decision not to use the person’s services in future.
8. Where further enquiries are needed to enable a decision about how to proceed, the case manager will discuss with the LADO how and by whom the investigation will be

undertaken. In straightforward cases, the investigation will normally be undertaken by a senior member of the school's staff.

9. Where the nature or complexity of the allegation requires it, the allegation may require an independent investigator.
10. The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. The school will offer appropriate support from other services.
11. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.
12. The school will inform parents or carers of the child or children involved about the allegation as soon as possible, if they do not already know of it. However, where a strategy discussion is required, or police or CSC services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case, only in relation to their child – no information can be shared regarding the staff member.
13. Parents or carers will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress, as set out in section 141F of the Education Act 2002 (see section 4 'Confidentiality and Information Sharing' below).
14. In cases where a child may have suffered significant harm, or there may be a criminal prosecution, we will work with CSC services, or the police as appropriate, to consider what support the child or children involved may need.

**The school will also act to manage and minimise the stress inherent in the allegations process.**

### **Supply Teachers**

In some circumstances the school may have to consider an allegation against an individual not directly employed by the school, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (hereafter together referred to as 'agency').

Whilst the school is not the employer of supply teachers, we will ensure that allegations are dealt with properly. In no circumstances will the school decide to cease to use a supply teacher owing to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. The Governing Body should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the Governing Body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, the school should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

## Governors

If an allegation is made against a governor, the school will follow similar procedures to those used to investigate a member of staff. Where an allegation is substantiated, the school would follow procedures to consider removing them from office.

## 4. Confidentiality and Information Sharing

In an allegations management meeting, or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of an allegation, and about the alleged victim (see Part 3 of this policy regarding referrals, working together and information sharing, based on the guidance in Part two of KCSIE 2025).

Where the police are involved, wherever possible the school will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as the investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.

CSC should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to us, the employer, without delay.

The school will make **every** effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions make it an offence (except in the limited circumstance expressly permitted by the legislation) for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

### **The reporting restrictions apply until:**

- The point that the accused person is charged with a relevant offence; or
- The Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the "publication" (any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public) of material by any person that may lead to the identification of the teacher who is the subject of the allegation.

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police wish to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted.

**The case manager will take advice from the LADO, police and CSC services to agree the following:**

- Who needs to know and exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it should arise.

## 5. Allegation outcomes

**The following definitions should be used when determining the outcome of an allegation:**

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to prove or disprove the allegation. The term therefore does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

## Reporting to the Disclosure and Barring Service and Teacher Regulation Agency

If the allegation is **substantiated** and:

- The person is dismissed, resigns or otherwise ceases to provide his or her services; or
- The employer ceases to use the person's services;

the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. The DBS address and contact details for referrals are listed in Appendix I.

<https://www.gov.uk/government/publications/dbs-workforce-guidance>

### A. Reporting to the Teaching Regulation Agency

Employers have a statutory duty to consider referral of cases involving serious professional misconduct to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) to consider prohibiting the individual from teaching. [The reasons for such an order are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute", or a "conviction, at any time, for a relevant offence".]

### B. Police and criminal investigation or prosecution

The school will make prompt contact with the police if a criminal offence is suspected.

The police should inform the LADO and the employer immediately when:

- A criminal investigation and any subsequent trial is complete;
- It is decided to close an investigation without charge; or,
- It is decided not to continue to prosecute after the person has been charged.

In the above circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social case should also inform that decision. The options will depend upon the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation or report is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should 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 CSC may be appropriate.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it, as per our behaviour policy and staff code of conduct.

### **Return to work**

Where it is decided on the conclusion of a case that a person who has been suspended should return to work, the case manager should consider how best to facilitate that. Guidance and advice will be sought via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience.

Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may also be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school.

### **Resignations and 'settlement agreements'**

Wrekin will not cease investigations if the person leaves, resigns or ceases to provide their services, nor will we reach a settlement/compromise agreement with that person until investigations into any allegations are concluded (as set out above).

**For further information on resignations, 'settlement agreements', record keeping and references see Part Four of KCSIE September 2025 (paragraphs 416-426).**

### **Learning lessons**

Throughout the process in handling allegations and at the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not the suspension was justified.

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

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

## **6. Allegations Made Against Pupils**

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's policy on behaviour, discipline and sanctions will apply.

### **Procedure to be followed:**

- The DSL should be informed immediately, who will liaise with the Head(s) and DDP;
- An investigation will be carried out, which will be led by a designated person in conjunction with the pupils' HsMs;
- The immediate safety of the victim will be considered and a safe place provided (Health and Wellbeing Centre);
- Both sets of parents will be informed;
- Support will be offered to BOTH individuals;
- Following investigation, an appropriate way forward will be decided in line with the school's behaviour policy.

### **Abuse by pupils in the school may be physical, sexual or emotional.**

There will be a need to distinguish between actions that can be dealt with through normal disciplinary channels and those that constitute potential abuse where involvement of other statutory agencies is required.

### **Child-on-child abuse can manifest itself in many ways. See Part II of this document.**

Abuse and Pupils with Special Educational Needs or Disabilities - see Appendix 4.

### **For further information see the following school documents:**

- Anti-Bullying and Child-on-child Abuse Policies
- Behaviour, Rewards and Sanctions Policy (includes the School Rules)
- E-Safety and Online Safety Policies

## **Child-on-Child Abuse: Support for Alleged Perpetrators**

The school recognises that children sometimes display harmful behaviour towards other children. Where this occurs, both the child who has experienced the harm and the child alleged to have caused the harm require safeguarding and support. The school will adopt a balanced approach which protects victims while also recognising the needs and vulnerabilities of the alleged perpetrator(s).

## **Recognition of needs**

- Children who harm others may themselves have unmet needs, may have been harmed in the past, or may currently be at risk of harm.
- The school will always consider whether the alleged perpetrator requires early help, a referral to specialist services, or a safeguarding response in their own right.
- Staff will avoid language that shames or labels children; the focus will be on behaviour, safety and support.

## Safeguarding response

- The Designated Safeguarding Lead (DSL) will oversee the management of all child-on-child abuse cases.
- A **risk assessment** will be carried out in relation to the alleged perpetrator, considering:
  - the context of the incident(s);
  - risk of harm to others;
  - safeguarding risks to the alleged perpetrator themselves.
- Where appropriate, the school may convene a **multi-agency risk assessment** (e.g. RAMP) with children's social care, police, CAMHS, or other agencies.

## Support planning for alleged perpetrator(s)

The school will put in place a support plan tailored to the child's needs. This may include:

- pastoral support, mentoring or trusted adult check-ins;
- access to counselling or emotional wellbeing services;
- targeted interventions to address behaviour and attitudes;
- restorative approaches (where appropriate and safe for the victim);
- referral to external specialist agencies such as CAMHS, youth services or family support;
- ongoing review and monitoring by DSL and pastoral staff.

This plan will run **alongside**, not instead of, any disciplinary or behaviour procedures required to uphold standards and maintain safety.

## Procedural fairness and rights

- The alleged perpetrator will be given information about what is alleged, and an opportunity to respond, unless to do so would place others at risk.
- Parents/carers of the alleged perpetrator will be informed and engaged as appropriate, unless this would increase risk to the child.
- The school will ensure confidentiality and sensitivity in managing information.
- Sanctions will be proportionate, consistent with the behaviour policy, and combined with supportive measures.

## **Monitoring and review**

- The support plan and any associated risk assessment will be reviewed regularly (at least monthly, or more frequently if required).
- Effectiveness of interventions will be evaluated, and adjustments made.
- Once risks are deemed managed and behaviour has improved, the plan may be stepped down in consultation with the pupil, family and any external professionals involved.

## **Training and curriculum**

- All staff will receive training in understanding child-on-child abuse, recognising that alleged perpetrators may also require safeguarding support.
- Staff will be trained in restorative practices, de-escalation, and referral routes.
- Through the curriculum (e.g. PSHE / RSHE), pupils will be taught about respectful behaviour, consent, boundaries, healthy relationships and empathy.

## **PART 10: ACTING ON CONCERNS REGARDING AN ADULT'S BEHAVIOUR (NOT AN EMPLOYEE OR VOLUNTEER WORKING FOR THE SCHOOL)**

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If you have any concerns about an adult's behaviour towards children or young people (not an employee or volunteer working for the school):

- Do not ignore it – the school and local safeguarding partnership will take any concerns very seriously;
- You must discuss your concerns with the DSL, who will support you in liaising with the statutory agencies should any child protection matter arise;
- Do not confront the adult but seek the advice of the DSL. If the DSL or other Designated Persons are not available contact the Head(s) or TWSP. Contact numbers can be found in Appendix I.

### **Acting on a disclosure from an adult that they are involved in the abuse of a child or young person**

If someone not employed by the school discloses that they are involved in the abuse of a child or young person, you must take action:

- Believe what they are saying and take the allegation seriously;
- Record details of what you have been told as soon as possible;
- Report it to the DSL, who will ensure the appropriate actions are taken, also explaining the limits of confidentiality;
- If for any reason you cannot contact the DSL immediately or another Designated Person or Head(s), then you must directly contact either CSC or the Police. Your actions must be communicated to the DSL as soon as possible. Contact numbers can be found in Appendix I.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Below are some safeguarding issues all staff should be aware of. For avoidance of doubt, Annex B of KCSIE 2024 will be referred to for any assistance that the DSL or any other school staff may need in ensuring a child's safety and welfare.

## Early Help

Wrekin believes that **any** child may benefit from early help, but we ensure that all staff are particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn in to antisocial 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 sexual or criminal exploitation;
- Is at risk of being radicalised or exploited;
- Has a family member in prison, or is affected by parental offending;
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- Is misusing drugs or alcohol themselves;
- Has returned home to their family from care;
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child.

**For further information see Appendix 4: Types of Child Abuse and Symptoms**

**All** staff should be aware of the [Telford & Wrekin Council early help process](#) and what groups of children they should be particularly alert to (see list above).

I	<b>Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)</b>
	Wrekin recognises that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as CCE (including county lines – see 2.) and CSE. They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child 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. CSE and CCE can affect children, both male and female and can include children who

have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Further information about CCE, including definitions and indicators, is included in Annex B of KCSIE 2025, with some indicators also listed below.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **Some of the following can be indicators of CCE:**

- Children who appear with unexplained gifts, money or new possessions;

- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

**The above CCE indicators can also be indicators of CSE, as can:**

- Children who have older boyfriends or girlfriends, and
- Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

We will follow the DfE [Child sexual exploitation: guide for practitioners](#).

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 Support Pathway](#). The concerns will be followed through sensitively and appropriately with fellow professionals and the [CATE Referral Form](#) will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around a child attending our school, 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 [CSE Warning Signs Checklist](#).

We recognise that group-based CSE is a distinct and serious form of abuse, often involving multiple perpetrators and complex grooming tactics. In line with the National Audit on Group-Based Child Sexual Exploitation and Abuse (2025), we are committed to identifying and responding to this form of exploitation with urgency and professionalism.

Our staff are trained to take disclosures seriously, act without delay, and challenge any culture of silence or inaction. We will not allow fear of being perceived as culturally insensitive to prevent us from protecting children. Safeguarding is paramount, and we will act on concerns regardless of the background of those involved.

Our response to CSE is trauma-informed, victim-centred, and includes long-term support for survivors. We work closely with local partners, including the police, social care, and specialist services, to disrupt exploitation and safeguard children.

**2 County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], 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.

	<p>Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, 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 manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.</p> <p>We recognise one of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. In these circumstances the DSL will consider a referral to the <a href="#">National Referral Mechanism</a>. 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 <a href="#">CLIMB</a>.</p> <p><b>Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:</b></p> <ul style="list-style-type: none"> <li>● Going missing/be absent from school or home and/or being found in areas away from their home;</li> <li>● Unexplained acquisition of money, clothes, or mobile phones;</li> <li>● Excessive receipt of texts/phone calls and/or having multiple handsets;</li> <li>● Relationships with controlling/older individuals or groups;</li> <li>● Suspicion of physical assault/unexplained injuries;</li> <li>● Parental concerns;</li> <li>● Carrying weapons or being the victim or perpetrator of serious violence (e.g. knife crime);</li> <li>● Significant decline in school results/performance;</li> <li>● Gang association or isolation from peers or social networks; and</li> <li>● Self-harm or significant changes in emotional wellbeing.</li> </ul> <p><b>CSE through involvement in county lines may mean children who:</b></p> <ul style="list-style-type: none"> <li>● Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;</li> <li>● Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;</li> <li>● 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;</li> <li>● Owe a ‘debt bond’ to their exploiters;</li> <li>● Have their bank accounts used to facilitate drug dealing.</li> </ul> <p>Where county lines exploitation is suspected, we will consult <a href="#">County Lines guidance</a> published by the Home Office.</p>
3	<p><b>Modern Slavery and the National Referral Mechanism</b></p>
	<p>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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them</p>

	to the NRM is available in the <a href="#">Modern Slavery Statutory Guidance</a> : how to identify and support victims.
<b>4</b>	<b>Child Abduction and Community Safety Incidents</b>
	<p>Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.</p> <p>Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.</p> <p>As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children’s confidence and abilities rather than simply warning them about all strangers. Further information is available at: <a href="#">action against abduction</a> and <a href="https://clevernevergoes.org/">https://clevernevergoes.org/</a>.</p>
<b>5</b>	<b>Child-on-Child Abuse</b>
	<p><b>Staff should be conversant with the school’s Anti-Bullying and Child-on-Child Abuse Policies.</b></p> <p>At Wrekin all staff are trained to understand that children can abuse other children; we refer to this as child-on-child abuse. Also, we recognise it can happen both inside and outside of school and online.</p> <p>We train staff to understand that, even if there are no reports in our school, it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have <b>any</b> concerns regarding child-on-child abuse (<b>including those that have happened outside of school and/or online</b>) they should speak to the DSL (or another DDP).</p> <p>Staff have also been trained to understand the importance of challenging inappropriate behaviours between pupils, 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. Wrekin staff have been trained to have a <b>zero-tolerance approach</b> to abuse for this reason. Our procedures reflect the guidance in Part Five of KCSIE 2025, ensuring that all reports are taken seriously, victims are supported, and appropriate safeguarding and disciplinary actions are taken. We recognise that child-on-child abuse can occur in any setting and must never be tolerated or passed off as “banter” or “part of growing up.”</p> <p><b>Child-on-child abuse is most likely to include, but may not be limited to:</b></p> <ul style="list-style-type: none"> <li>● Bullying (including cyberbullying, prejudice-based and discriminatory bullying);</li> <li>● Abuse in intimate personal relationships between peers;</li> </ul>

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

**Wrekin actively seeks to raise awareness of and prevent all forms of child on-child abuse by:**

- Educating all governors, all staff, pupils, and parents about this issue;
- Educating pupils about the nature and prevalence of child-on-child 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 welfare of the pupil body by drawing on multiple resources that prioritise pupil mental health, including Mindfulness, yoga and providing access to the school's counsellor;
- Working with governors, 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 conditions in which our pupils can aspire to, and realise, safe and healthy relationships fostering a whole-school culture;
- Responding to cases of child-on-child abuse promptly and appropriately, and
- Ensuring that all child-on-child abuse issues are fed back to the DSL and Deputy Designated Persons (DDPs) so that they can spot and address any concerning trends and identify pupils who may be in need of additional support.

Wrekin will actively engage with TWSP in relation to child-on-child abuse, and work closely with, for example, CSC, 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 child-on-child abuse. The DSL (or a DDP) 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.

Wrekin recognises that any child can be vulnerable to child-on-child abuse owing 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 other children.

**We know that research suggests:**

- Child-on-child abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously;
- 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 child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

**Our response to child-on-child abuse, including reports of sexual violence or sexual harassment:**

We will undertake training for staff to help us develop the foundation for a calm, considered and appropriate response to any reports.

We will always reassure victims that they are being taken seriously and that they will be supported and kept safe. We will never give a victim the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report.

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

The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

All staff, especially the DSL (or DDP) will give immediate consideration as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). If any of the children involved has SEND the DSL will liaise with the SENCo (who is a DDP) to assist in the management of the report.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL will consider what urgent action can be taken, this may include seeking specialist help, such as advice from [The Internet Watch Foundation](#) and the police in preventing the images spreading further and removing the images from the internet.

**The DSL (or DDP) 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 (or DDP) 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 (or DDP) considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual pupil/pupils in question might otherwise require it, the DSL (or DDP) 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 DDP) becoming aware of the alleged behaviour.

**The DSL (or DDP) will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:**

1. Manage internally;
2. Early help;
3. Referral to CSC and
4. Reporting to the police.

**The school will always carry out a written safety plan/risk assessment in respect of:**

- Any child who is alleged to have behaved in a way that is considered to be abusive or violent;
- Any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
- Any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

It may be appropriate to contact CSC and/or police to assist in carrying out a safety plan. The DSL may use and consider the [TWSP Sexually harmful behaviour - risk assessment tool](#). Where other children have been identified as witnesses to alleged abuse or violence, consideration will also be given by the DSL (or DDP) to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

**When responding to concern(s) or allegation(s) of child-on-child abuse, the school will:**

- Always consider carefully, in consultation with CSC, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the pupil(s) affected, their parents, staff, and other pupils and individuals;
- Record the information that is necessary for the school and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved;
- Keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- Be mindful of and act in accordance with its safeguarding and data protection duties.

Wrekin will use KCSIE 2025 to assist in the managing of reports.

Where necessary for effective safeguarding we will utilise/seek resources and seek support from

	<p>established sources. We will consider and in some cases access the <a href="#">Child on child abuse toolkit</a> to assist in our decision making and will also consider the <a href="#">Brook traffic light tool</a>.</p> <p>In relation to consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery), this school will, where necessary, consult with guidance produced by <a href="#">The UK Council for Child Internet Safety (UKCIS) Education Group Sharing Nudes and Semi-Nudes</a> and DfE guidance <a href="#">Searching, screening and confiscation</a>. The DSL (or DDP) will take the lead on these issues.</p>
	<p><b>Tackling Violence Against Women and Girls (VAWG)</b></p> <ol style="list-style-type: none"> <li>1. We are committed to the principles of the Government’s Tackling Violence Against Women and Girls Strategy (2021), which prioritises prevention, supports victims, pursues perpetrators, and strengthens safeguarding systems.</li> <li>2. We recognise that girls are disproportionately affected by sexual violence, harassment, and abuse, and that these harms can intersect with other vulnerabilities such as race, disability, and social disadvantage.</li> <li>3. Our approach is trauma-informed, victim-centred, and rooted in early intervention. We will challenge all forms of gender-based violence, educate pupils on consent and respect, and work with partners to disrupt harmful behaviour and protect those at risk.</li> </ol>
<b>6</b>	<p><b>Sexual Violence and Sexual Harassment Between Children</b></p>
	<p>All those part of the Wrekin community believe that sexual violence and sexual harassment is <b>not</b> acceptable and will <b>not</b> be tolerated.</p> <p>The school understands that sexual violence and sexual harassment can occur between two children of <b>any</b> age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.</p> <p>We recognise that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. 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 set out earlier in this policy, all staff are advised to maintain an attitude of <b>‘it could happen here’</b>.</p> <p>We will ensure that <b>all</b> victims are taken seriously and offered appropriate support. Members of staff are aware that some groups are potentially more at risk. We know that evidence shows girls, children with SEND and LGBT children are at greater risk.</p> <p><b>We will ensure that staff are aware of the following:</b></p> <ul style="list-style-type: none"> <li>● Sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up;</li> <li>● Sexual violence or sexual harassment must never be tolerated or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and</li> </ul>

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

### Sexual Violence

Wrekin staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. 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.

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.

### Sexual Harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. 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, and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. This may include:
  - Non-consensual sharing of sexual images and videos;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media;
  - Sexual exploitation; coercion and threats; and
  - Upskirting.

## Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Wrekin recognises '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.

For further advice on Sexual Violence and Sexual Harassment Between Children, we will refer to Part Five of KCSIE 2025.

**Please refer to our policy and procedures with regard to child on child abuse (and point 3 above as regards reporting and responding to reports of such abuse.)  
Responding to reports of sexual violence and sexual harassment.**

In addition to the processes outlined above, all staff have been trained to look out for particular signs or actions of children that may indicate they have been victims of abuse (as opposed to children making a direct report of such abuse). In addition, all staff have been trained as to how to manage a report, although ideally the DSL or a DDP will manage all reports (although this may not always be possible).

Where the report includes an online element, we will follow the [searching screening and confiscation advice](#) (for schools) and the [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). **The key consideration is for staff not to view or forward illegal images of a child.** The advice above provides more detail 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 to hand them to the police for inspection.

As with all reporting, staff should not promise confidentiality to the person reporting (since it is very likely a concern will have to be shared further (e.g. with the DSL or CSC), and staff should **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 who the report will be passed to.

We recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse. We are aware that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

As set out above, staff have been trained to listen 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. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the

nature of that harm was. Best practice is to wait until the end of the report 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 of 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 CSC and/or part of a criminal investigation. All staff have been trained to inform the DSL (or Deputy), as soon as practically possible, if the DSL (or Deputy) is not involved in the initial report.

See also: risk assessments (p48 above).

**Important considerations following a report of sexual violence and/or sexual harassment:**

The DSL (or Deputy) is likely to have a complete safeguarding picture and to be the most appropriate person to advise on the school's 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 the school's or college's duty and responsibilities to protect other children;
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- The ages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator(s) 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;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Are there ongoing risks to the victim, other children, adult students or school or college staff; and,
- Other related issues and wider context, including any links to child sexual exploitation (CSE) and child criminal exploitation (CCE) – see above.

Management of reports will be considered on a case-by-case basis, and in accordance with the relevant guidance, as already stated, but the general principles are as set out above.

7	<h3>Serious Violence</h3>
	<p>At Wrekin all staff are aware of indicators, which may signal that children are at risk from, or are involved with 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 wellbeing, or signs of assault or unexplained injuries.</p> <p>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 (see CCE and CSE above).</p> <p>Staff are aware of the associated risk factors which increase likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft and robbery. We will follow the advice provided in the Home Office's <a href="#">Preventing youth violence and gang involvement</a> and its <a href="#">Criminal exploitation of children and vulnerable adults: county lines guidance</a>.</p>
8	<h3>Attendance and Children Missing Education (CME)</h3>
	<p>Where children have gone missing we will follow the <a href="#">Local Missing Children Process</a>.</p> <p>At Wrekin the staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities, such as neglect, child sexual and child criminal exploitation. See Part 7 of this document for further information.</p> <p>As part of induction staff will be made aware of their school's unauthorised absence and children missing from education procedures.</p>
	<h3>Children Leaving School Without Permission</h3>
	<ol style="list-style-type: none"> <li>a. In addition to morning and afternoon attendance registration, pupils are registered in lessons.</li> <li>b. Where <b>children leave the classroom or leave the school grounds without permission</b>, this is covered within our Missing Pupil Policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5) where it is 'reasonable in all circumstances to safeguard and promote the child's welfare'. However, in principle, if a pupil runs out of class we will establish where he or she has gone. Teachers will not run after them but will send a message to the Head(s) Office for adult support.</li> </ol> <p><b>Where children have gone missing</b> and not in manner of the above we will follow the school's Missing Pupil Policy.</p> <p>We endeavour to hold <b>more than one emergency contact number for each pupil</b>.</p> <p><b>Staff should be conversant with the school's Missing Pupil Policy.</b></p>
9	<h3>Children with Family Members in Prison</h3>

	<p>This school recognises that children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use the information from <a href="#">NICCO</a>, to help mitigate negative consequences for those children.</p>
<b>10</b>	<b>Children and the Court System</b>
	<p>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 <a href="#">5-11 year-olds</a> and <a href="#">12-17 year-olds</a>.</p> <p>This school will follow these guides to ensure the correct process is followed and support and special measures are made available.</p> <p>We understand that when child arrangements via the family courts are made following separation this can be stressful and entrench conflict in families and this can be stressful for children. We will follow the Ministry of Justice online <a href="#">child arrangements information tool</a> in managing these situations.</p>
<b>11</b>	<b>Domestic Abuse</b>
	<p>The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.</p> <p>This school recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer abuse in their own intimate relationships. All of these can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn. We recognise domestic abuse as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are “personally connected” (as defined in section 2 of the 2021 Act) – i.e. who are, or have been, intimate partners or family members (regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.</p> <p><b>The abuse can encompass, but is not limited to:</b></p> <ul style="list-style-type: none"> <li>• Psychological;</li> <li>• Physical;</li> <li>• Sexual;</li> <li>• Financial; or</li> <li>• Emotional.</li> </ul> <p>Domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. Wrekin staff will refer to this statutory</p>

	<p>guidance if domestic abuse is suspected, once it becomes available. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. We understand 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.</p> <p>Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child 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.</p> <p>The school 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 supported where needed. <a href="#">Operation Encompass</a> operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to CSC if they are concerned about a child’s welfare. 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 impact on children’s development.</p> <p>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.</p> <p>We will use the following additional advice on identifying children who are affected by domestic abuse and how they can be helped:</p> <ul style="list-style-type: none"> <li>● <a href="#">NSPCC- UK domestic-abuse Signs Symptoms Effects</a></li> <li>● <a href="#">Refuge what is domestic violence/effects of domestic violence on children</a></li> <li>● <a href="#">SafeLives: young people and domestic abuse</a></li> <li>● <a href="#">Domestic abuse: specialist sources of support</a></li> </ul> <p>(government guidance, which includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse).</p>
<b>12</b>	<b>Homelessness</b>
	<p>Wrekin understands that being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The DSL (and DDPs) are aware of contact details and referral routes into the <a href="#">Local Housing Authority</a> so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent</p>

	<p>arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into CSC where a child has been harmed or is at risk of harm.</p> <p>Our staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, we also recognise 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. CSC will be the lead agency for these children and the DSL (or a DDP) will ensure appropriate referrals are made based on the child's circumstances. The following government factsheets will be consulted as necessary: <a href="#">Homelessness Reduction Act Factsheets</a></p>
<p><b>13</b></p>	<p><b>So-called Honour Based Abuse (including Female Genital Mutilation and Forced Marriage)</b></p>
	<p>Wrekin recognise that so-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. We see all forms of HBA as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure the school community is alert to the possibility of a child being at risk of HBA, or already having suffered HBA.</p> <p><b>Actions</b></p> <p>If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or DDP). As appropriate, the DSL (or DDP) will activate local safeguarding procedures by contacting Family Connect/local social care team for the child and the police.</p> <p><b>FGM</b></p> <p>FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.</p> <p>Whilst all staff should speak to the DSL (or DDP) with regard to any concerns about female genital mutilation (FGM), there is a specific <b>personal legal duty on teachers (see below)</b>.</p> <p>See Annex B of KCSIE 2025 for further details. As a school we will follow the National FGM Centre <a href="#">Female Genital Mutilation: Guidance for schools</a> .</p> <p><b>FGM mandatory reporting duty for teachers</b></p> <p>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 <b>teachers</b>, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either</p>

	<p>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 <b>not</b> be examining pupils or students, 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 <a href="#">Mandatory reporting of female genital mutilation procedural information</a>.</p> <p>Teachers <b>must</b> 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 DDP) and involve CSC 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: <a href="#">FGM Fact Sheet</a>.</p> <p>In respect of FGM we will adopt the local <a href="#">TWSP FGM Practice Guidelines and Resource Pack</a> as part of safeguarding responsibilities and inform/educate our staff in this particular area.</p> <p><b>Forced Marriage</b></p> <p>Wrekin 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.</p> <p>We will follow the Forced Marriage Unit published <a href="#">statutory guidance</a> and <a href="#">Multi-agency guidelines</a>, pages 32-26 of which focus on the role of schools. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email <a href="mailto:fmu@fco.gov.uk">fmu@fco.gov.uk</a>.</p>
14	<p><b>Preventing Radicalisation and the PREVENT Agenda</b></p>
	<p>Wrekin understands 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.</p> <ul style="list-style-type: none"> <li>● <b>Extremism</b> is the vocal or active opposition to our fundamental 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.</li> <li>● <b>Radicalisation</b> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.</li> </ul>

- **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).

We understand where possible it is 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 which must include reporting their concerns to the DSL (or DDP) who will consider making a Prevent referral.

### **The Prevent duty**

Wrekin 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. Our DSL and deputies and other senior leaders are familiar with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76.

We will follow the published advice for schools on the [Prevent duty](#).

We aim to ensure that all members of staff have completed formal training on the Prevent duty.

This policy reflects the Prevent Duty Guidance for England and Wales (2023), which came into force on 31 December 2023. We recognise our statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism."

We adopt a whole-setting approach to Prevent, ensuring that all staff are trained to identify signs of radicalisation and extremism, understand the referral process, and know how to respond proportionately. Our DSL and senior leaders are familiar with the 2023 guidance, including the revised definitions of extremism and terrorism, and the expectations for risk assessment, partnership working, and information sharing.

We work in close partnership with the local authority, police, and Channel Panel, and follow the local Prevent referral pathway. Our curriculum promotes fundamental British values and resilience to extremist narratives. We also ensure that our filtering and monitoring systems are reviewed annually and are proportionate to the risks identified in our Prevent risk assessment.

If we feel children are being abused through extremism or being radicalised, we will consult directly with Family Connect or the local social care team for the child and the police PREVENT team, and seek advice. We will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha and Paul Fenn**. Our policy also recognises that the local police can be contacted in imminent circumstances on 01386 591835/591825 or 591816 and at [prevent@warwickshireandwestmercia.pnn.police.uk](mailto:prevent@warwickshireandwestmercia.pnn.police.uk).

**Channel**

Wrekin recognises Channel as a voluntary, 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 multi-agency Channel panel if we are concerned that an individual might be vulnerable to being drawn into terrorism and consider the appropriate support required. We will always seek the individual’s consent to do so, since an individual’s engagement with the programme is entirely voluntary at all stages. We will follow the [Channel guidance](#).

In advance of a child leaving Wrekin, the DSL will consider if it would be appropriate to share any information with their new school or college, e.g. information that would allow the new school or college to continue to support victims or abuse or those who are currently receiving support through the ‘Channel’ programme, to have that support in place for when the child arrives.

**E-learning and support websites for staff**

An introduction to the Prevent duty: [Prevent awareness e-learning](#)  
 Supporting staff to make referrals: [Prevent referrals e-learning](#)  
 Supporting staff who may be asked to contribute to or sit on a multi-agency Channel panel: [Channel awareness e-learning](#).

[Educate against hate](#) is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism, with free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

**15 Fabricated and Induced Illness**

“The fabrication or induction of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness: 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”.

**Taken from ‘[Safeguarding Children in whom illness is fabricated or induced](#)’ HM Government.**

This supplementary guidance to ‘[Working Together to Safeguard Children](#)’ will be **Adopted by this establishment and we will adhere to our duties set out in ‘Working Together’.**

<b>16</b>	<b>Suicide Intervention</b>
	<p>a. This school accepts and understands that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. This school wants to work with our pupils and work in partnership to support anyone in our school community that may have thoughts of suicide. This school will follow the school's Suicide Intervention Policy (contained in Pupil Wellbeing and Mental Health Policy and Guidelines) to assist wherever we can in 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: <a href="http://zerosuicidealliance.com/">http://zerosuicidealliance.com/</a></p> <p>b. This school recognises that <b>suicide bereavement has been described as 'grief with the volume turned up'</b>. The effects on families, communities and society as a whole are devastating and tragic.</p> <p>c. This school will support in any way we can and the link below will be signposted as appropriate: <a href="http://www.petesdragons.org.uk/">http://www.petesdragons.org.uk/</a></p>
<b>17</b>	<b>Drug and Substance Misuse</b>
	<p>Where issues come to the attention of the school in relation to drugs and substance misuse we will follow the school's Controlled Drugs and Substance Misuse Policy, which follows the non statutory advice contained within <b>'DfE and ACPO drug advice for schools' September 2012</b>. This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within school. The document produced by the Department of Education and the Association of Chief Police Officers clearly sets out the role of schools, their powers and what schools can do. Coupled with this preventative and supportive approach this will sit hand in hand with our statutory functions of child protection and the alerting to established referral procedures and the law of the land. Our Controlled Drugs and Substance Misuse Policy is a stand-alone policy, but for avoidance of doubt our stance and our approach are stated here.</p>
<b>18</b>	<b>Private Fostering, Homelessness and Homestay Arrangements</b>
	<p>a. A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or under the age of 18 if the child is disabled. This extends to children who are within homestay arrangements.</p> <p>b. Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases where so called 'sofa surfing' has been evident. It is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.</p> <p>c. This school also recognise that children whether through family difficulties or through their own choice could be at risk of <b>becoming homeless</b>. This school recognises that we will refer and consult with relevant agencies to support any families/child or children in this situation.</p> <p>d. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify CSC as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to CSC, the school will encourage parents and private foster carers to notify CSC and will share information to CSC as appropriate.</p>

	In the case of Homestay arrangements, we will ensure that our school falls within the duties as set out in KCSIE 2025. For avoidance of doubt these include any arrangements at home or abroad.
<b>19</b>	<b>Cybercrime</b>
	<p>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).</p> <p>Cyber-dependent crimes include;</p> <ul style="list-style-type: none"> <li>• unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;</li> <li>• denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,</li> <li>• 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.</li> </ul> <p>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 (or a deputy), will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: <a href="#">Cyber Choices</a>, <a href="#">‘NPCC- When to call the Police’</a> and <a href="#">National Cyber Security Centre</a></p>
<b>20</b>	<b>Virtual School Heads and Kinship Care</b>
	<ol style="list-style-type: none"> <li>1. As a non-maintained school/college we have an appropriately trained teacher who will take the lead in working with the virtual school head. The teacher works with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child’s personal education plan. The teacher also works with the virtual school head to promote the educational achievement of previously looked after children. We will follow the statutory guidance on ‘Promoting the Education of Looked After Children.’</li> <li>2. The role of Virtual School Heads includes a non-statutory responsibility to promote the educational achievement of all children in kinship care. We recognise the importance of this role in supporting children living in informal and formal kinship arrangements, who may face additional barriers to education.</li> </ol>

	<p>3. We will work with the Virtual School Head in line with the non-statutory guidance 'Promoting the education of children with a social worker and children in kinship care arrangements' to ensure that these pupils receive appropriate support and that their needs are reflected in our safeguarding and pastoral systems.</p> <p>4. The DSL, Head(s), governors, SENCO and senior mental health lead will work with the virtual school head to promote educational attendance, attainment and progress of children with a social worker.</p> <p>5. The virtual school head for Telford and Wrekin is: <b>Michelle Salter</b>.</p>
<p><b>21</b></p>	<p><b>Mental Health</b></p>
	<p>At Wrekin 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.</p> <p>We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Members of 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.</p> <p>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.</p> <p>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 or a DDP and recording their concern.</p> <p>We will follow the DfE and guidance on <a href="#">Preventing and Tackling Bullying</a> , and <a href="#">Mental Health and Behaviour in Schools</a>. <a href="#">Rise Above</a> has links to appropriate materials and lesson plans. In line with KCSIE 2025, we recognise that mental health concerns may be an indicator of abuse, neglect, or exploitation. Our safeguarding response includes dynamic safety planning, referral to appropriate services, and regular review of support plans for pupils with mental health needs.</p> <p><b>Please refer to our Wellbeing and Mental Health Policies.</b></p>

## Appendix I

### Contact Details

**Day-to-Day Designated Safeguarding Lead:** Jill Spence - Tel: 01952 265600 (S)

**Supervising Designated Safeguarding Lead:** David Blackham - also Senior Deputy Head (Pastoral) - Tel: 01952 265600 (S), 07483 973081 (M).

**Deputy Designated Person:** Steve Morton - contactable through school: 01952 265600

**Deputy Designated Person:** Claire Ferley - contactable through school: 01952 265600

**Wrekin Trust Safeguarding Adviser:** Jill Spence contactable through school: 01952 265600

**Head(s):** Simon Platford MBE & Ben Smith. Contactable through school: 01952 265602.

**The Nominated Governor for Safeguarding and Child Protection:** Laura Lenander, contactable through school: 01952 265600.

**Chair of Governors:** Dr. Emma Crawford Contactable through school: 01952 265600.

**Social Care Safeguarding Team (TWSP) Helpdesk via The Family Connect Team:**

- Tel: 01952 385385
- Opening hours Monday to Friday between 9am to 5pm (excluding bank holidays)
- After 5pm and on weekends contact the Emergency Duty Team on 01952 676500

**Local Authority Designated Officers:** Glenn Ashbrooke. Contactable at: Derby House (3rd Floor), Wing A, Lawn Central, Telford TF1 2BB. Tel: 01952 382848

**This is the number to be used for allegations against staff or volunteers working at the school**

**Education Safeguarding Children Co-ordinator, Telford & Wrekin Council, Access and Inclusion, School Performance and Development.** Tel: 01952 380989

**Attendance Support Team - Pupil Tracking Officer:** Tel: 01952 385229

**Police** - Tel: 0300 333 3000 or 101

**Channel Police referral (for radicalisation/extremism concerns) contact the Warwickshire and West Mercia Prevent Team:** [prevent@warwickshireandwestmercia.pnn.police.uk](mailto:prevent@warwickshireandwestmercia.pnn.police.uk) or contact the local police on 01386 591835/591825

New Prevent referral paperwork can be found at

<https://www.telford.gov.uk/blog/education-nb/post/132/special-education-notice-new-prevent-referral-process-effective-from-monday-24-january-2022>

## Appendix 2

### Key Documentation and Guidance

- [Working Together to Safeguard Children \(HM December 2023\)](#)
- [Keeping Children Safe in Education, 01.09.25 \(September, 2025\)](#)
- [‘Guidance for Safer Working Practice for those working with Children and Young People in Educational Settings’](#) produced by the Safer Recruitment Consortium May 2019
- [Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism - HM Government 2015](#)
- [The Prevent Duty – Departmental advice for schools and childcare providers \(DfE June 2015\)](#)
- [Child Sexual Exploitation \(DfE February 2017\)](#)
- [Information Commissioner’s Office - Taking Photographs in Schools](#)
- [Information Sharing HM Government July 2018](#)
- [Working together to improve school attendance \(DfE August 2024\)](#)
- [The Boarding Schools National Minimum Standards \(DfE Sept 2022\)](#)
- [What to do if you’re worried a child is being abused – advice for practitioners \(HM Government March 2015\)](#)

#### Useful Websites:

[Telford and Wrekin Safeguarding Partnership](#)

[\(TWSP\) The Independent Schools](#)

[Inspectorate](#)

[Every Child Matters - DfE 2003 NSPCC](#)

## Appendix 3

### Role Description for the Nominated Governor for Safeguarding and Child Protection

The governor responsible safeguarding and child protection will play an essential role in ensuring children in this school are kept safe from harm. This governor should ensure oversight and scrutiny of the child protection and safeguarding policy, procedures and practice on behalf of the full governing body. It is recognised that governors are volunteers and generously give of their time, interest and expertise to the ultimate benefit of children in our schools, but it should not be underestimated that their role is that of a 'senior manager' of a school with accountability befitting such a significant responsibility.

1. Act as a 'critical friend' to the school, in order to ensure that the appropriate systems and procedures are in place to cover all aspects of the safeguarding agenda and all statutory governing body responsibilities are met.
2. Monitor appropriate policies, including the safeguarding and whistleblowing policies.
3. Ensure there is a suitably qualified, trained and supported Designated Safeguarding Lead (DSL) who has responsibility for responding to and overseeing safeguarding issues.
4. Ensure there is a suitably qualified, trained and supported Deputy Designated Person (DDP) who has responsibility for responding to and overseeing issues as agreed to be reasonable to be delegated by the DSL.
5. Ensure that the DSL adequately supervises and supports the work, development and wellbeing of the DDP and any other individual to whom they may delegate additional safeguarding responsibilities in order that there exists clear lines of accountability.
6. Ensure there is a robust system for recording, storing and reviewing child welfare concerns.
7. Liaise with the Head(S) about general child protection and broader safeguarding issues within the school and as such be able to provide reports to the governing body in respect of themes and issues within the school/locality to enable adequate oversight, understanding and development of solutions.
8. Ensure that school staff training is up to date.
9. Attend (Formal) Raising Awareness Safeguarding and Child Protection Training every 3 years and other regular updates training on an annual basis as appropriate to the role and relevant to issues within the school/locality.
10. Ensure other governors attend appropriate child protection and safeguarding training.
11. Ensure appropriate members of the governing body complete training in respect to allegations against staff.
12. Ensure at least one governor on the recruitment and selection panel for a head has successfully completed accredited safer recruitment training.
13. Ensure at least one member of the SLT on the recruitment and selection panel for staff has successfully completed accredited safer recruitment training.
14. Ensure interview panels are convened appropriately and safer recruitment practices are followed.
15. Have oversight of the single central record and ensure it is up to date and maintained in line with guidance.
16. Take account of how safe pupils feel when in school.
17. Ensure the voice of pupils is truly heard and appropriately acknowledged.
18. Ensure the school constantly reviews and considers its curriculum in order that key safeguarding 'messages and lessons' run throughout.
19. Ensure the school does not operate in isolation and has an awareness of agencies available to support children and families.
20. Ensure the child protection and safeguarding agenda is embedded in the ethos of the school.
21. Monitor progress against any outstanding actions on the governing body child protection and safeguarding audit tool and other local authority review.
22. Provide an annual report to the full governing body to include, amongst other relevant items, detail pertaining to training themes, issues, number of CAF/EHA assessments led by school (including the number escalated to Child in Need/Child Protection or de-escalated), contribution to multi-agency meetings and good practice.

*It should be noted that this is a suggested outline only and not an exhaustive list of 'duties'.*

## Appendix 4

### Abuse, Neglect and Exploitation

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

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

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

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

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

### Types of Child Abuse and Symptoms

**‘Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.’** KCSIE September 2025.

**The needs and rights of children fall into the following main categories:**

- The need for physical care and protection from preventable harm;
- The opportunity for physical and mental growth;
- The need for love and security and the opportunity to relate positively to others;
- The need for new experiences and help in relating to their environment by the way of organising and mastering age appropriate levels of responsibility;
- The need for intellectual development.

A parent/carer must be able to meet these needs or help their child by ensuring they are otherwise met.

A child may be considered to be abused, or at risk of abuse, by its parents/carers when those basic needs are not being met. Careful professional and legal assessment are essential in determining when a child's needs are not being met to such an extent that it constitutes abuse.

Child abuse includes abuse of a pupil by a member of staff or other adult, abuse at home, which a pupil reports to staff (or another pupil), abuse by a stranger outside school and abuse of one pupil by another pupil.

## I. Types of Abuse

**Child abuse can take many forms but they are usually divided into four categories:**

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

### Physical Abuse

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

### Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 the 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though 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 (also known as child-on-child abuse) in

education and ALL staff should be aware of it and the policy and procedures for dealing with it - see Part 11 Point 3: child-on-child abuse in this policy.

## **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 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); or
- Ensure access to appropriate medical care or treatment.

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

## **2. Indicators of Abuse, Neglect and Exploitation – Signs and Symptoms**

The following is a list of signs and symptoms that may be consistent with abuse, neglect and exploitation; some children can exhibit one or more of these signs for other reasons. If there are concerns about a child displaying any of these indicators the concern should be shared with the DSL (JSP) or other Designated Persons (DBI, CDF, SM) in the school.

### **Physical Abuse**

#### **Physical Indicators**

Unexpected bruises/welts/lacerations/abrasions – especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of the injury or when it appears frequently.

#### **Unexpected bruises etc:**

- On face, lips, mouth
- On torso, back, buttocks, thighs
- In various stages of healing
- Twin bruises on either side of the mouth or cheeks – can be caused by pinching or grabbing
- Bruising on either side of the ear – this is often caused by grabbing a child who is attempting to run away
- Slap marks – these may be visible on the cheeks or buttocks
- Grip marks on arms or trunk
- Clustering forming regular patterns
- Reflecting shape of article used, e.g. belt, buckle, electrical flex
- On several different surface areas
- Regularly appear after absence, weekend or holiday
- Bite marks or fingernail marks
- Black eyes – are most commonly caused by an object such as a fist coming into contact with the eye socket (NB. A heavy bang to the nose may cause bruising to spread around the eyes but a doctor will be able to tell if this has occurred)

### **Unexplained burns:**

- Cigar or cigarette burns especially on soles, buttocks, palms or back
- 'Immersion' burns, where hands, feet or body have been forcibly immersed in very hot water
- Patterns like electrical burner, iron etc.
- Rope burns on arms, legs, neck or torso

### **Unexplained fractures:**

- To skull, nose, facial structure
- In various stages of healing

### **Behavioural Indicators**

- Flinching when approached or touched
- Reluctance to change clothes for PE lessons
- Wary of adult contacts
- Difficult to comfort
- Apprehension when other children cry
- Crying/ irritability
- Frightened of parents
- Afraid to go home
- Rebelliousness in adolescence
- Reported injury caused by parents
- Behavioural extremes - aggressiveness, withdrawal, impulsiveness
- Regression or child-like behaviour
- Apathy
- Depression
- Poor peer relationships
- Panic in response to pain

## **Neglect**

### **Physical Indicators**

- Consistent hunger
- Underweight
- Persistent stomach-aches, feeling unwell
- Poor hygiene
- Inappropriate dress
- Consistent lack of supervision, especially in dangerous activities for long periods
- Unattended physical problems or medical needs
- Abandonment

### **Behavioural Indicators**

- Begging
- Stealing food
- Constant fatigue, listlessness
- Poor relationships with care-giver
- Frequent delays in picking child up from playground

## Sexual Abuse

### Physical Indicators

- Difficulty in walking, sitting down
- Stained or bloody underclothing
- Pain or itching in genital area
- Bruising, bleeding, injury to external genitalia, vaginal and/or anal areas
- Vaginal discharge
- Bed-wetting
- Excessive crying
- Sickness
- Pregnancy, urinary tract infections (UTI), sexually transmitted disease (STD) are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified

### Behavioural Indicators

- Inappropriate sexual behaviour (e.g. drawing of pornographic or sexually explicit images) or knowledge for the child's age
- Promiscuity
- Sudden change in behaviour
- Running away from home
- Wary of adults
- Feeling different from other children
- Unusual avoidance of touch
- Reporting of assault
- Substance abuse (e.g. glue sniffing)
- Emotional withdrawal through lack of trust in adults
- Over-compliance with requests of others
- Frequent complaints of unexplained abdominal pains
- Eating problems
- Sleep disturbances
- Poor peer relationships
- Possessing money or 'gifts' that cannot be adequately accounted for
- Inappropriately sexually explicit drawings or stories
- Enuresis or soiling, especially at the end of the day
- Frequent non-attendance at school
- Avoidance or fear of medical examinations

## Emotional Abuse

### Physical Indicators

- Failure to thrive
- Delays in physical development or progress

### Behavioural Indicators

- Sucking, biting, rocking
- Anti-social, destructive
- Sleep disorders, inhibition of play
- Complaint, passive, aggressive, demanding
- Inappropriately adult or infant

- Impairment of intellectual, emotional, social or behavioural development

### 3. Abuse by a Pupil

In the case of abuse by a pupil, or a group of pupils, the key issues which identify the problem as abuse are:

- The frequency, nature or severity of the incidents;
- Whether the victim was coerced by physical force, fear, or by a pupil or group of pupils having power or authority over him or her;
- Whether the incident involved a potentially criminal act and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable;
- **As a boarding school, supervision has to be extra vigilant to ensure the wellbeing of all of its children.** The school is mindful of relationships in boarding and the potential for abuse by other boarders.

**The Utting Report (1997) asserts that “possibly half the total abuse reported in institutions is peer abuse”.**

**The school has a separate Child-on-child Abuse Policy; see Part 10 Point 5 earlier in this document for a summary.**

#### **Bullying**

Wrekin considers any form of bullying unacceptable and aims to deal with it firmly and effectively as per the school's Anti-Bullying Policy. Members of staff are required to be constantly alert to the problem of bullying and to report all concerns to the DSL and the relevant Housemaster/Housemistress.

If not challenged and stopped, sustained peer-on-peer bullying can have profound long-term effects on their victims, and can even be fatal. Child abuse can be perpetrated by another child.

#### **When does bullying turn into child abuse?**

The point at which 'bullying' turns, potentially, into 'peer child abuse' is the point at which significant harm is caused, or likely to be caused, to the physical or emotional wellbeing of the victim. If peer child abuse is suspected, child protection procedures will be followed and this may include the need to refer abuse to Social Care Safeguarding Team.

## 4. The Three other Categories of Abuse

- **Discriminatory Abuse**

This abuse is usually motivated by discriminatory and oppressive attitudes towards race, gender, cultural background, religion, physical and/or sensory impairment, sexual orientation and age.

- **Financial Abuse**

Examples include: theft, fraud, exploitation, and pressure in connections with wills, property, possessions or benefits.

- **Institutional Abuse**

This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct.

## 5. Abuse and Pupils with Special Educational Needs or Disabilities

Pupils with SEN or disabilities are particularly vulnerable and can face additional safeguarding challenges. Some children are at risk of having their body language and behaviour misinterpreted by other children, young people and adults. This is particularly important when pupils have social and communication problems associated with autism or specific medical problems. Some young people display specific indicators of abuse at all times and where these have been shown not to be as a result of abuse it is important to monitor any changes in a child's behaviour, physical condition, emotional state and sociability. Such changes may themselves indicate that abuse is taking place.

Therefore, additional barriers can exist when recognising abuse or neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further investigation;
- Pupils with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

Staff should read individual pupil files to familiarise themselves with SEND and medical conditions that can present with the same symptoms as abuse.

Because such judgements often require sophisticated knowledge and understanding all staff **MUST** err on the side of caution. It is better to discuss a hundred cases where no abuse is occurring than to miss one case because a wrong assumption has been made. If there is any worry or concern about a child it must be discussed with the DSL.

## 6. The Symptoms of Stress and Distress

When a child is suffering from any one or more of the previous four 'categories of abuse', he/she will nearly always suffer from/display signs of stress and distress. An abused child is likely to show signs of stress and distress as listed below:

- A lack of concentration and a fall-off in school performance;
- Aggressive or hostile behaviour;

- Moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences;
- Difficulties in relationships with peers;
- Regression to more immature forms of behaviour, e.g. thumb sucking, bed-wetting (or its persistence);
- Self-harming or suicidal behaviour;
- Low self-esteem;
- Wariness, insecurity, running away or truancy – children who persistently run away from home may be escaping from sexual/physical abuse;
- Disturbed sleep;
- General personality changes such as unacceptable behaviour or severe attention seeking behaviour;
- A sudden change in school performance.

## **7. Parental Signs of Child Abuse**

Particular forms of parental behaviour could raise or reinforce concerns:

- Implausible explanation of injuries;
- Unwillingness to seek appropriate medical treatment for injuries;
- Injured child kept away from school until injuries have healed without adequate reason;
- A high level of expressed hostility to the child;
- Grossly unrealistic assumptions about child development;
- Inappropriate labelling of child's behaviour;
- Leaving children unsupervised when they are too young to be left unattended.

It is important to realise that all types of abuse may be the root cause of other issues such as self harm which includes eating disorders. For more details on these, please refer to the school's policy on Self-Harm and Eating Disorders.

## Appendix 5

### Advice When Answering Questions

#### Offering Advice

The role of the HsM and Tutor is vital to the ethos of the school's pastoral system and part of their role will necessarily involve talking to pupils on matters of concern. However, the 1992 Education Act places certain constraints on the role of the Tutor/Mentor as confidant. If a pupil asks a teacher for advice on sexual matters, the teacher must not trespass on the parents' rights and responsibilities. Therefore, the teacher should encourage the pupil to seek advice from his or her parents and, if appropriate, from the relevant health service professional.

#### Teachers cannot:

- Give personal advice or counselling on sexual matters (including contraception and abortion) to a pupil (either individually or in a group) if a parent has withdrawn that pupil from sex education;
- Give personal contraceptive advice to pupils under 16 (for whom sexual intercourse is illegal) without parental consent. (Legally a teacher can give a child under 16 contraceptive advice if the teacher believes that doing so is in the child's best interests. However in certain circumstances the teacher could be liable to criminal charges and therefore the school's instructions are not to give such advice and to refer the matter to the DSL).

#### Teachers can:

- Provide pupils with education and information about where and from whom they can receive confidential sexual advice and treatment, e.g. the Health and Wellbeing Centre.

#### Explicit Questions

It is unlikely to be appropriate to deal with a pupil's explicit questions by dealing with it in front of the whole class, e.g. questions on oral and anal sex. In practice this means that teachers have to say "I am sorry but the school's policy and legislation does not allow me to answer that question". The teacher must speak with the child's HsM who may deem it appropriate to discuss the child's concerns with the parents – a decision may then be taken on how best to deal with it. Answers to the 'questions in a box' approach must only be given after a very careful screening of the questions. In all cases of explicit questions being asked by a child to a member of staff, abuse should only be suspected when the questions are totally inappropriate to the age of the child.

**TEMPLATE FOR RECORDING INCIDENTS/LOW LEVEL CONCERNS\***

<b>Child's First name:</b>	<b>Surname:</b>	<b>DOB</b>
<b>House:</b>	<b>Date and time of incident (include year)</b>	
<b>Year:</b>		

(Child's address etc to be completed by the DSL)

<b>Address:</b>	<b>Telephone:</b>
<b>Are there other children in the family? If yes, please give details.</b>	

**Nature of concern or incident. Please give details of when and where it took place and who witnessed the concern or incident**

**If you require more space please attach a separate sheet to this form.**

**To be completed by the DSL**

<b>Who else informed and any other further action</b>		
<b>Signed</b>	<b>Designation</b>	<b>Date/Time of record</b>
<b>Date form passed to DSL</b>		<b>Number of previous concerns</b>
<b>Further action agreed Yes / No</b>	<b>Signed DSL</b>	
<b>Pre CAF Assessment Yes / No</b>	<b>Reason</b>	

*\*A concern is when the care of a child is less than may be expected from a reasonable parent, or when a child's behaviour indicates they may not be receiving an adequate level of care but this does not amount to an allegation disclosure or child abuse concern.*

**Concern sheets should be passed to the DSL for overview, collation and any further necessary action**

## CHILD PROTECTION CONCERN/DISCLOSURE FORM

<b>Child's First name:</b>	<b>Surname:</b>	<b>DOB</b>
<b>House:</b>	<b>Date and time of incident (include year)</b>	
<b>Year:</b>		

**(Child's address etc to be completed by the DSL)**

<b>Address:</b>	<b>Telephone:</b>
<b>Are there other children in the family? If yes, please give details.</b>	

<b>Source(s) of concern:</b>
<b>Nature of Concern:</b>
<b>Action Taken:</b>
<b>Further Action to be Taken (if necessary):</b>
<b>(To be completed by the DSL)</b>

**Signed:**  
(By the person raising the concern)

**Date:**

**Signed:** (DSL)

**Date:**

## Front Sheet: Child Protection Record

<b>Name of child:</b>	<b>Date of birth:</b>
<b>Any other names by which child known:</b>	<b>Date file started:</b>
<b>Address:</b>	<b>Other family /household members Include full name and relationship. For U18s, include age, if known.</b>
<b>Telephone:</b>	
<b>Are any other child protection files held in school relating to this child or another child closely connected to him/her?</b> <b>YES/NO - If YES give details</b>	
<b>Name and contact number of key worker (Children's Social Care Services), if known</b>	<b>Name and contact number of GP, if known</b>
<b>Other agency involvement – name, agency and contact number</b>	



## Appendix 7

### Checklist

**For handling and recording allegations or complaints made against a member of staff or volunteer** (For use by the Case Manager)

1.	Name and position of member of staff who is subject of allegation/complaint:	
2.	Is the complaint written or verbal?	
3.	Who has made the complaint?	
	Relationship to child:	
4.	Name of child:	D.O.B:          Age:
5.	Parents'/Carers name:	Parents'/Carers' address:
6.	Date of alleged incident/s:	
7.	Did the child attend school on this/these dates?	
8.	Nature of the complaint (please use a continuation sheet if necessary)	
9.	Other relevant information:	
10.	LADO contacted:	Date:
	Further action advised by Children's Services:	

### Yes / No Checklist

	Do you have details (either a written account or notes from a verbal account) of the alleged incident, signed and dated?	<b>Y / N</b>
--	--	--------------

	Have you checked the incident could actually have taken place (i.e. was the child in the lesson and was the member of staff teaching the lesson that day)?	<b>Y / N</b>
	Is there evidence of significant harm, e.g. a visible injury?	<b>Y / N</b>
	Has a criminal offence taken place, e.g. has excessive force been used that could be classed as an assault?	<b>Y / N</b>
	Has the incident been reported to anyone else, e.g. the Police?	<b>Y / N</b>
	Were there any witnesses to the incident – if so, have you made a note of names?	<b>Y / N</b>
	Are parents aware of the allegation?	<b>Y / N</b>
	Is the member of staff aware of the allegation?	<b>Y / N</b>
	Have you reported the allegation to the LADO?	<b>Y / N</b>
	Do you consider the serious harms threshold has been met?	<b>Y / N</b>

**Remember - do not attempt to investigate the allegation yourself.**

**Your name:**

**Position:**

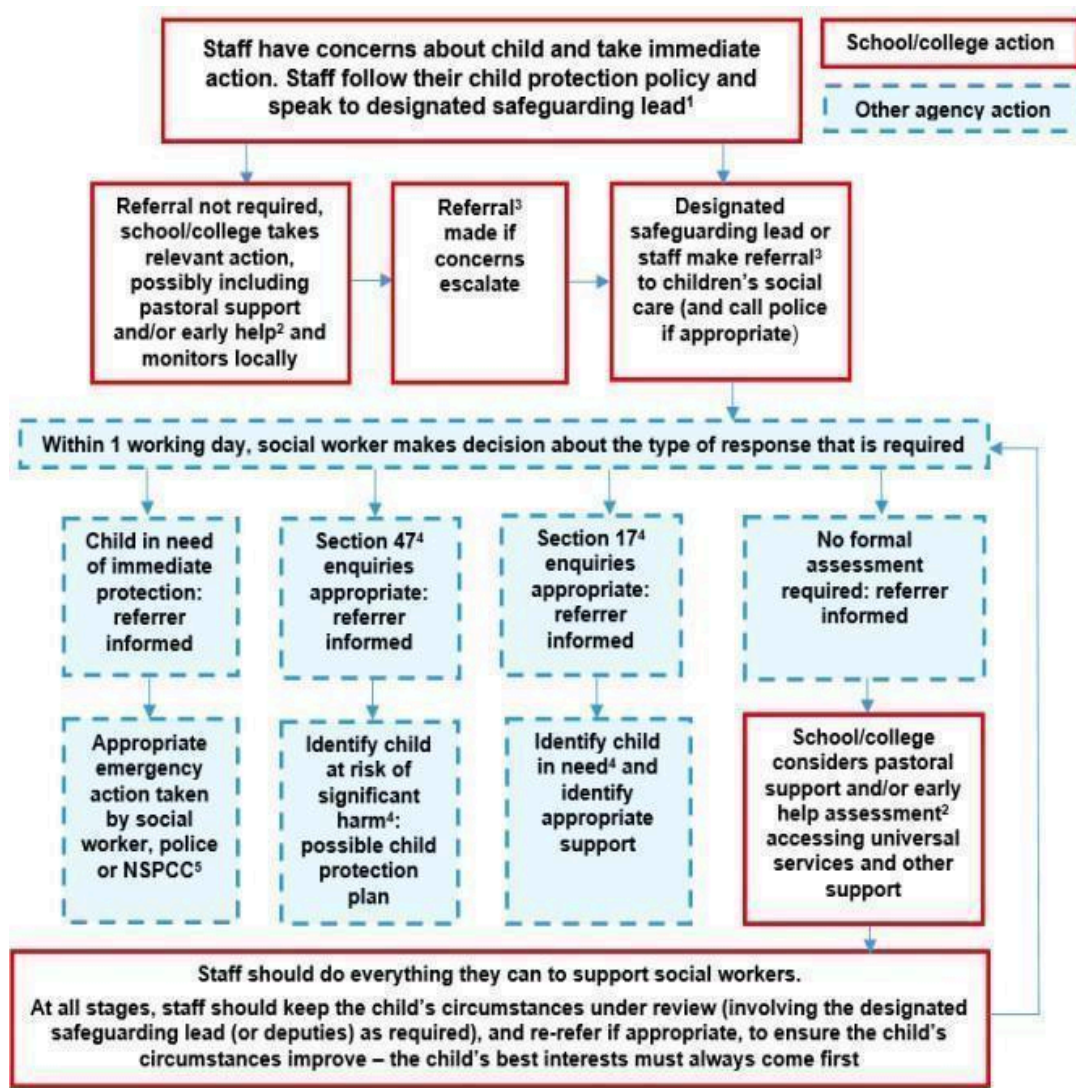
**Signature:**

**Date**

## Appendix 8

### Actions where there are concerns about a child

KCSIE 2025:



1 In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance. 2 Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process. 3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children. 4 Under the Children Act 1989, 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. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children. 5 This could include applying for an Emergency Protection Order (EPO).

## Appendix 9

### Transfer Form for Safeguarding Records between Educational Establishments

#### Transfer of Child Protection and Safeguarding Records

##### Part 1 - To be completed by sending school

Child's name	
Date of birth	
Current school year	

##### Information and files transferred:

Name of sending school/setting	Wrekin College
Address of sending school/setting	Sutherland Rd, Wellington, Telford TF1 3BH
Name of receiving school/setting	
Sent by	Secure email / post / delivered by hand

No CP / Safeguarding concerns	<input type="checkbox"/>
Pastoral information attached:	<input type="checkbox"/>
Safeguarding records attached:	<input type="checkbox"/>
External Agency Involvement:	<input type="checkbox"/>

Transferred by:	
Name:	Position:
Signed:	Date:

##### Part 2 - To be completed by receiving school / setting / college

Received by:

Name:

Position:

Signed:

Date:

***Receiving school - please complete part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. We advise that you keep a copy for your own records.***

## Appendix 10

### Residential accommodation in Independent schools

1. As a boarding school/residential special school/residential college we understand the additional factors we must consider with regard to safeguarding. Staff are alert to signs of abuse in our setting. We have staff structures in place to enable boarding pupils to share concerns, anxieties and worries. Staff will work with pupils to address their concerns, anxieties and worries, and always consider the voice of pupils to take appropriate actions, when required.
2. As an independent and/or boarding school we have processes and pathways to determine suitability of education placements for children and young people with additional needs, including administration of medication.
3. As an independent and/or boarding school we have sought assurance that all education guardians who are not family members to the pupil have received appropriate training in child protection and safeguarding and children's mental health to help them to understand the vulnerabilities of children within their caseload. We have assured ourselves that these education guardians have suitable policies in place to enable them to meet the needs of children and share the [TWSP Threshold Guidance](#) and [Escalation Policy](#) with them.
4. We will comply with the relevant standards and guidance for our sector.

## Appendix I I

### Appendix: Protective Security and Preparedness

This appendix outlines how the setting aligns with the Department for Education's guidance on Protective Security and Preparedness for Education Settings (April 2025).

#### **Embedding a Security Culture**

The setting promotes a whole-setting approach to security awareness and preparedness. All staff receive training to identify suspicious activity and understand their role in maintaining a secure environment. Security is embedded within the safeguarding culture and emergency planning processes.

#### **2. Staff Roles in Protective Security**

The Head(s) are designated as the Security and Incident Lead. All staff, including non-teaching staff, are briefed on their responsibilities in the event of an incident. These roles are defined in the emergency plan and reviewed annually.

#### **Tailoring Emergency Plans to the Setting**

The emergency plan is tailored to the site layout, pupil needs, and local risks. Vulnerabilities such as building access, location, and events are considered. Plans are tested annually through drills and reviewed following any incidents.

#### **RUN HIDE TELL Protocols**

All staff and pupils are trained in the RUN HIDE TELL principles. Age-appropriate materials are used to educate pupils on how to respond to threats. Visual reminders, such as posters are displayed in key areas.

#### **Grab Kits**

Grab kits are maintained in the school office and include site maps, contact lists, first aid supplies, high-visibility vests, and emergency communication tools. These kits are checked termly and updated as needed.

#### **Communication During an Incident**

Procedures are in place for internal and external communication during incidents. The Head(s) or a designated deputy liaises with emergency services and the local authority. Parents are informed via the emergency communication system.

#### **Post-Incident Welfare and Review**

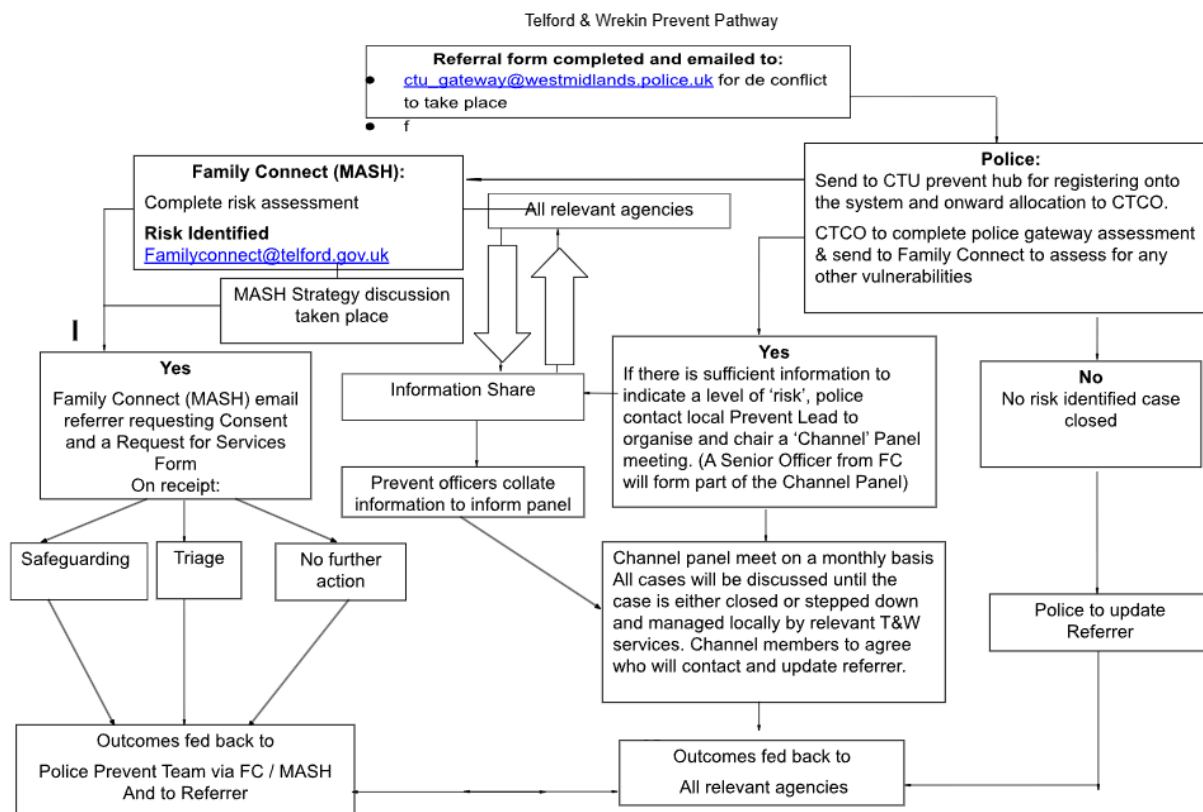
Welfare support is provided to pupils and staff following incidents, including access to counselling. A post-incident review is conducted to evaluate the response and update plans. Lessons learned are shared with staff and governors.

#### **Training and Resources**

Staff complete the ACT for Education e-learning module annually. The setting uses the Protective Security and Preparedness self-assessment tool to review readiness. Staff receive annual safeguarding updates, which includes security preparedness.

## Appendix I2

### Telford & 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.

#### 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 01952 385385 Out of Hours 01952 676500</b>	<b>First Point of Contact 0345 678 9021 Out of Hours 0345 678 9040</b>	<b>Childrens Advice and Support Service 0300 111 8007 Out of Hours 0345 604 2886</b>	<b>MASH 01902 555392 Out of Hours 01902 552999</b>
<b>If you think a child is in immediate danger, call the Police on 999 For non-Police emergencies, call 101</b>			
<b>Childline 0800 1111</b>	<b>NSPCC 0800 800 5000</b>	<b>Public Protection Unit (West Mercia Police): 0300 333 3000</b>	

