



Safeguarding and Child Protection Policy

Key persons for Safeguarding

Designated Safeguarding Lead	Mrs K Trueman-Brown	Deputy Head	01384685101
Deputy Designated Safeguarding Leads	Miss A Lewis Miss E Williams	Head Teacher Assistant Head	01384685101
Governor with responsibility	Michelle Woolgrove		01384685101
Head Teacher	Miss A Lewis		01384685101

Date of last review: September 2026

Agreed by Governors: 22nd September 2026

Shared with all Staff: September 2026

Frequency of Review: Annually

Date of next review: September 2027

Other Key Persons

Named Designated Person for Children in Care (CiC)	K Trueman-Brown	01384685101
Privately Fostered named person (School)	K Trueman-Brown	01384685101
Privately Fostered named person (Dudley LA)	Angela Marsh	
School Online Safety Lead	K Trueman-Brown	01384685101
Local Authority Designated Officer (DO), for allegations against staff	Yvonne Nelson Brown Sukhchandan Kaur	01384813110 01384 813164 allegations@dudley.gov.uk Yvonne.Nelson-Brown@dudley.gov.uk Sukhchandan.Kaur@dudley.gov.uk
Chair of Governors	Michelle Woolgrove	01384685101
Vice Chair of Governors	Stuart Baird	01384685101
Local Authority Virtual Head	Emma Thomas	Emma.Thomas@dudley.gov.uk
School Mental Health Lead	K Trueman-Brown	01384685101

Useful Numbers

Dudley Single Point of Access/MASH Out of Hours Emergency Duty Team	0300 555 0050 0300 555 8574
Local Authority Designated Officer	01384 813061
Police	Child Abuse Investigation Unit, Halesowen Police station 101 Ext: 79026071 or 79026072
Young Person and Family Help Officer – Police	a.peters@west-midlands.pnn.police.uk k.russell@west-midlands.pnn.police.uk Mobile Tel - 07391864242 External Tel: - 101 option 3 West Midlands Police Extension 851 308
Prevent Referrals	Liaise with Dudley's Community Safety Partnership (safe & sound) www.dudleysafeandsound.org/prevent

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Howley Grange Primary School Values, Purpose and Commitments

‘Achieve, Believe, Care’

At Howley Grange our core purpose is to make a positive difference to our children through:

- *broadening their minds and increasing aspirations ensuring every child **achieves** their full potential*
- *raising children’s self-**belief** and confidence through celebrating effort, hard work and successes*
- *supporting every child to show **care** for themselves, others and their environment, enriching every community to which they belong*

We will do this by:

- creating a family atmosphere where all members of our school community feel listened to and valued
- delivering consistently high-quality teaching and learning
- planning a broad curriculum which inspires, engages and motivates children
- providing a safe, supportive, inclusive and stimulating environment of which we can all be proud
- nurturing a culture of respect and understanding

1. Purpose and Aims of this policy

Howley Grange Primary aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues
- Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, LGBTQ+, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are Children in Care or previously Children in Care
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

2. Statutory Framework

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2026\)](#), and the [Governance Handbook](#) in addition [DfE’s filtering and monitoring standards](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under section 26 of the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse
- The Crime and Policing Act 2026.
- The Children's Wellbeing and School Act
- Information Sharing Duty Statutory guidance for safeguarding organisations and their practitioners (UK Government, September 2026)
https://assets.publishing.service.gov.uk/media/6aa2a5b1c5796a7a179c665a/Information_sharing_duty_statutory_guidance.pdf
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the 2018 Childcare Disqualification Regulations) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [Early years foundation stage statutory framework \(EYFS\) March 2021](#)

3. Local multi-agency safeguarding arrangements

The school's policy has been written taken into consideration our locally agreed multi-agency procedures that have been put in place by the three safeguarding partners:

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

The links for Dudley's procedures are below:

<https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/>

4. The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team.

THE DESIGNATED SAFEGUARDING LEAD (DSL) FOR HOWLEY GRANGE PRIMARY SCHOOL IS:

- 1) Kate Trueman-Brown (Deputy Head)

The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL is contactable out of school hours and during the holidays by email on DSL@howley.dudley.sch.uk

When the DSL is absent, the deputies – will act as cover.

THE DEPUTY DESIGNATED SAFEGUARDING LEADS (DSLs) FOR HOWLEY GRANGE PRIMARY SCHOOL ARE:

- 1) Emily Williams (Assistant Head)
- 2) Angela Lewis (Head Teacher)

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

- Work closely with teachers and share information & provide advice and support to other staff on child welfare and safeguarding and child protection matters
- Sets out procedures so that staff promptly share their safeguarding concerns in writing
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.
- Refer cases where a crime may have been committed to the Police
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children, particularly in relation to Family Help
- Work closely with Mental Health Leads
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Panel, Disclosure and Barring Service and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding and takes the lead of the filtering and monitoring systems and processes in place at our school, this is included in the DSL's job description
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensuring that child protection files are kept up to date
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

- The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

As a team of DSLs, we support each other and offer mutual safeguarding supervision. We can also access external supervision via DSPP.

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

5. The Headteacher and Governing Body

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

- Ensuring that staff (including temporary & supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Ensuring that staff (including temporary & supply staff) understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly, including online and cyber security.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL / LADO on this
- Complete appropriate safeguarding and child protection (including online) training
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting
- Promoting good oral health and signposting accordingly to services

The Governing body will approve this policy at each review; ensure it complies with the law and hold the headteacher to account for its implementation.

The Governing Body will appoint a senior board level member to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

THE NOMINATED GOVERNOR FOR CHILD PROTECTION AND SAFEGUARDING FOR HOWLEY GRANGE PRIMARY SCHOOL IS: Jayne Griffiths

The Chair of governors, **Michelle Woolgrove**, will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate.

The Governing Body will be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements. All Governors have read and understood Keeping Children Safe in Education 2026.

Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.

The Governing Body, will seek assurance of the following areas:

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

- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- Our school has appropriate cyber security systems in place
- Reviewing the effectiveness of filtering and monitoring systems at least once every academic year – as well as details on who should carry out these reviews
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Our school has a policy in respect to the use of restrictive interventions

Other areas of assurance include:

Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness.

This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

6. Safeguarding Policies and Procedures/Legal Responsibilities and Duty to Share Information

Safeguarding and promoting the welfare of children:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. See section 12 of this policy which explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section 12 of this policy defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour

can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following three **Safeguarding Partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

7. Roles and Responsibilities

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

The school plays a crucial role in preventative education by embedding safeguarding and well-being in the school curriculum. Our school curriculum is detailed in Section 22 of this Policy.

All staff

All staff will:

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

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the pupil behaviour policy, and the safeguarding response to children who go missing from education
- The Family Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

8.0 Training

To ensure that the DSL and deputies, also all staff, governors and volunteers are able to fulfil their safeguarding responsibilities the following training will be in place.

8.1 The DSL and deputies

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

The DSL will undertake child protection and safeguarding training at least every 2 years. Online safety training will be undertaken annually and regularly updated to keep knowledge of staying safe online and the risks associated up to date, this includes including filtering and monitoring and cyber security

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

8.2 All Staff

All staff members will undertake safeguarding and child protection training, online safety training including IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse, neglect and exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

In addition:

- All staff will undertake annual Cyber-security training.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils.
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates including online safety, as required but at least annually. Regular updates throughout the academic year could include (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- All new staff will receive robust safeguarding training in line with the whole school training package, this will be delivered as part of their induction process before they commence working with our pupils/students.

8.3 Volunteers and Contractors

All volunteers and contractors will receive safeguarding procedures and guidance on their arrival at the school. This will include how to report a concern, the behavioural expectations of the visitors to ensure that children are safe, also filtering and monitoring alongside appropriate use of mobile technology. Safeguarding information will be provided as required during their time working with the school to ensure that they are compliant. All visitors and contractors are required to show DBS / ID as relevant and will be asked to wear a lanyard. A red lanyard shows they have appropriate DBS. A green lanyard means they should be accompanied at all times by a member of school staff as have not provided a DBS.

8.4 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This will ensure that all governors have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge, in addition that they can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

All Governors will undertake training relating to online filtering and monitoring, in addition one Governor will be trained in Cyber-security.

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

9. Confidentiality

The Data Protection Act (DPA) 2018 and GDPR do not prevent, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 10.

It is the responsibility of all staff to share information about the protection of children with the Designated safeguarding Lead and other professionals.

Any information about children and families will only be shared in a professional context.

Every effort will be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know, professional basis only.

10. Communication with Parents / Carers

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. If in doubt, we will consult with the local authority children's social care team.

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

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

In the case of allegations of abuse made against other children, we will usually notify the parents of all the children involved. If parents or carers have concerns about a child they should contact one of the DSLs in school. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

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

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

11. Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse. All pupils know who the trusted adults are in school.
- Ensure our reporting systems are well promoted through school assemblies, and are easily understood and easily accessible for pupils through education within the PSHE curriculum.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

12. Whole Staff Responsibilities and Procedures – Reporting Concerns and Referral

Schools and their staff are an important part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who is exposed to children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals will make sure their approach is child-centred. This means that they will consider, at all times, what is in the **best interests** of the child. It is the responsibility of **ALL** staff, volunteers and governors to inform the designated Safeguarding Lead of any concerns without delay and **record this in writing** using the online CPOMS system. Children includes everyone under the age of 18.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. School staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn.

All staff will be prepared to identify children who may benefit from Family Help (see section 11).

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Figure 1 (below) illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by completing a Request for Advice and Support on Dudley [Children's Services Portal site](#) or contact 0300 555 0050. Children with a Sandwell address can be referred in via <https://www.sandwellchildrenstrust.org/> or a Birmingham address is https://www.birmingham.gov.uk/info/20019/children_young_people_and_families

To refer into Dudley Exploitation hub (DEX): CS.Hub@dudley.gov.uk also complete a Request for Support and Advice Form to be submitted via the portal.

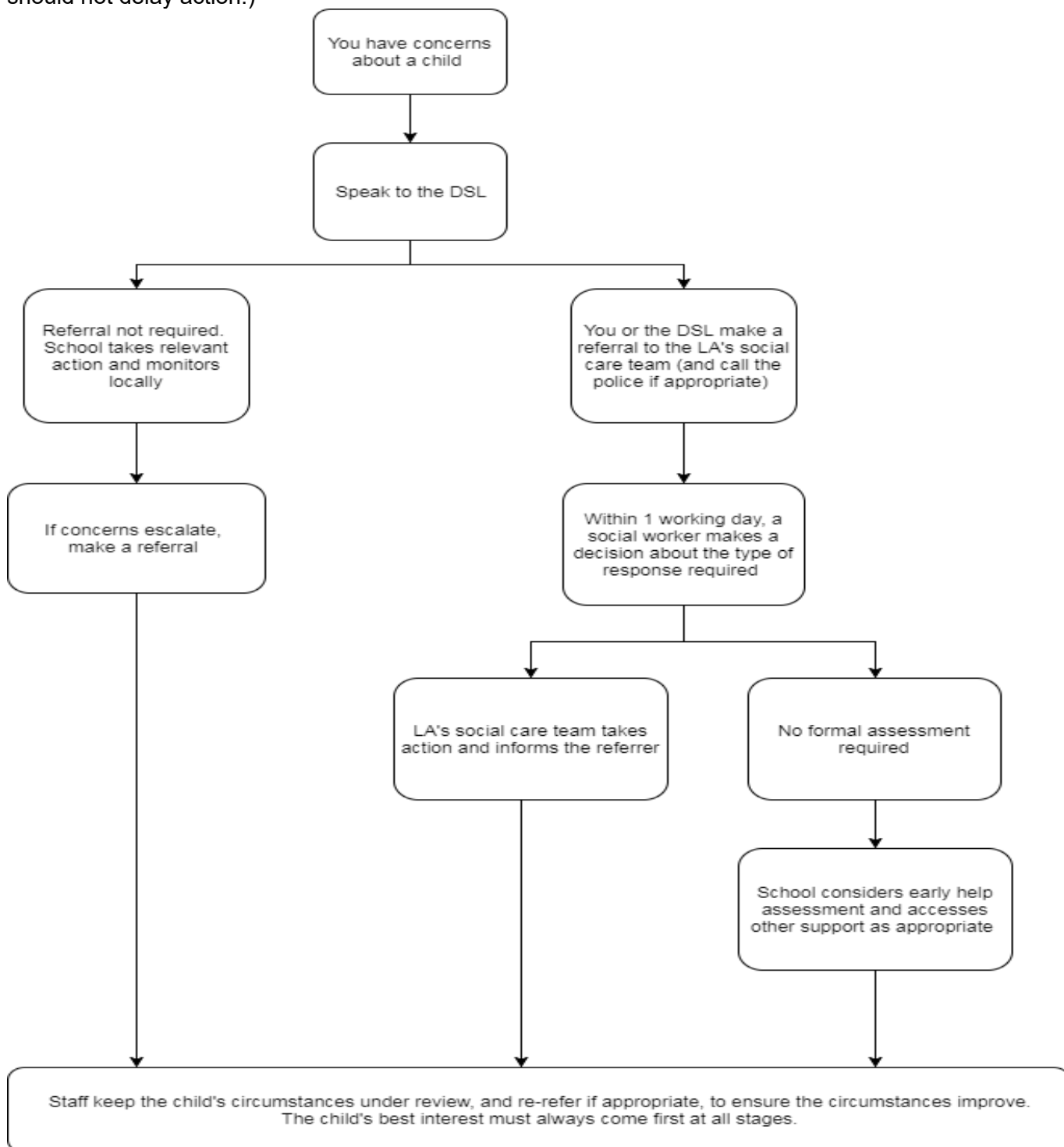
Make a referral to Local Authority Children's Social Care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

If it is appropriate to refer the case to Local Authority Children's Social Care or the Police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

The Local Authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Advice and further information on Dudley Professional Resolution can be accessed from the Lead for Safeguarding in Education or directly of the Dudley Safeguarding partnership website.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)(Note – if the DSL is unavailable, this should not delay action.)



Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they will **always** speak to the designated safeguarding lead (or a deputy). It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

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

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

Make a referral to Multi Agency Support Team relevant to the child's home address, for Dudley children this is Dudley Front Door and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL/DDSL as soon as possible if you make a referral directly.

Dudley **Report it** page: <https://dudleysafeguarding.org.uk/>

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
 - Stay calm and do not show that you are shocked or upset
 - Reassure the child. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
 - Check that you have understood correctly what the child is trying to tell you.
 - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
 - You will be asked to make a **written record promptly**, stick to the facts, and do not put your own judgement on it. The written record will be done on CPOMS if you have access, if you do not then complete the reporting form (*Appendix 1*) available from the staff room noticeboard, (yellow for a concern, red for a child at risk of immediate harm) and hand it directly to the DSL or a deputy DSL. **Do not** leave it in their pigeon hole or on their desk for them to 'find'. When recording on CPOMS choose to **notify all four DSLs**. If relevant, a body map is available on CPOMS to record the location of any visible marks. At no time should an individual teacher/member of staff consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.
 - Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so
 - Maintain confidentiality on a need to know basis only. Aside from a DSL, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- It is important to also understand the following:
- ✓ The child may not feel ready, or know how to tell someone that they are being abused, exploited or neglected
 - ✓ Not recognise their experiences as harmful
 - ✓ Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

The child's wishes: Where there is a safeguarding concern, the governing body and school leaders will ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. At Howley Grange we complete wishes and feeling work with children at a level appropriate for their maturity. All systems and processes operate with the **best** interests of the child at their heart.

13. Record Keeping

- We will hold records in line with our records retention schedule.
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing within 24 hours. If you are in any doubt about whether to record something, discuss it with the DSL. DSLs will record discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.
- At no time should an individual teacher/member of staff consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely, within 5 school days of starting at the new education setting, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information (using the pupil safeguarding form) to enable them to have time to make any necessary preparations to ensure the safety of the child.
- Information will be stored securely online (CPOMS) and any paper work will be stored in a lockable cupboard away from other pupils files. These both will have restricted access to designated people and be maintained in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

14. Dudley's Thresholds and Family Help

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

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

Level 1 - No referral is required. Professionals should contact Dudley's Family information Service on 01384 814398 to obtain information about support available for children, young people and families.

Dudley Safeguarding Partnership threshold guidance is below, this should be considered when completing Request for Help and Support Form: <http://dudleysafeguarding.org.uk/children/wp-content/uploads/sites/2/2026/06/Dudley-Continuum-of-Help-and-Support-Final.pdf>

15. When to be concerned

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.

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.** Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

15.1 Signs and Symptoms of Abuse and Neglect

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse may involve:

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

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 the child is aware of what is happening.

The activities may involve:

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

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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 caregivers)
- Ensure access to appropriate medical care or treatment

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

16. Specific Safeguarding Issues

All staff will have an awareness of safeguarding issues- some of which are listed below.

16.1 Child on Child abuse

a) Allegations of abuse made against other pupils

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. It can also take place both face-to-face and online and can occur simultaneously between the 2.

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

Child on child abuse can also include the following:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) including those generated using AI.
- Up skirting, 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
- 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)

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

We recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment

We will be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes. Staff are required to discuss with the DSL if they're concerned about a pupil being exposed to misogynistic or misandrist content.

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

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- **Ensure staff are trained to understand:**
 - ✓ How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - ✓ That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - ✓ That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - ✓ Children can show signs or act in ways they hope adults will notice and react to
 - ✓ A friend may make a report
 - ✓ A member of staff may overhear a conversation
 - ✓ A child's behaviour might indicate that something is wrong
 - ✓ That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - ✓ That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - ✓ The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - ✓ That they should speak to the DSL if they have any concerns

- ✓ That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
 - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

16.2. Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13

➤ The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)
If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 10 of this policy also apply to recording incidents of sexting.

17. Honour Based Abuse (including FGM and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

17.1 Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises '*all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.*'

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

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

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

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

17.2 Forced Marriage

Implementation of the Marriage and Civil Partnership (Minimum Age) Act 2022, Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

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

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

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

The DSL will:

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

18. Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL/DDSL. The DSL will assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff are alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Staff will also be alert to when children might be at highest risk around the school day (for example, immediately after school). Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital, DSL/DDSL will make appropriate referrals and ensure that the right level of support is accessed, and where necessary communications with Police

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

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

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

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

19. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery. The DSL/DDSL will ensure a relevant child protection and modern slavery referral is completed where a potential victim of CCE or CSE is identified.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Indicators can include a child:

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

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

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

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

20. Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation,

or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. If you have serious concerns about a child missing / missing from education complete a MARF or ring the police.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

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

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

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

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

https://assets.publishing.service.gov.uk/media/65f1b048133c22b8eecd38f7/Working_together_to_improve_school_attendance_applies_from_19_August_2024.pdf

21. Missing pupils

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

- Lockdown the school site immediately making staff aware of situation
- Non class-based staff will get a radio and search immediate area, a member of staff will stay in main office as point of contact.
- If they cannot be found within 10 minutes a phone call will be made to parents and the police.
- Following the incident, it will be recorded on CPOMS and discussed by SLT to ensure anything that can be learnt will be acted upon to limit a reoccurrence. Depending on circumstances it may be necessary that a risk assessment is written for that child.

If a child goes missing out of school hours we will be as supportive to parents as we can and ensure the police are involved.

22. Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

23. Domestic Abuse

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (the designated safeguarding lead) before the child or children arrive at school the following day.

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

24. Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Up skirting is now a criminal offence as part of The Voyeurism (Offences) Act and came into force on 12th April 2019.

Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. Ultimately, the school will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- ✓ Challenging inappropriate behaviours
- ✓ Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures within school ensuring that the DSL is informed immediately.

25. Radicalisation and Extremism

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

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

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

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

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our reporting procedures including discussing their concerns with the DSL.

Staff should **always** act if they are worried.

Dudley's LA Prevent Officer is Mark.Wilson@dudley.gov.uk

If you have concerns about extremism:

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

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

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

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

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

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

26. Mental Health

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

The school's Mental Health Lead is: Kate Trueman-Brown

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff, 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. Positive mental health is the concern of the whole community and we recognise that schools play a key part in this. Our school wants to develop the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs.

We understand that there are risk factors, which increase someone's vulnerability, and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter balance and promote further growth of resilience.

It is vital that we work in partnership with parents to support the well-being of our pupils. Parents should share any concerns about the well-being of their child with school, so appropriate support and intervention is identified and implemented.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and speak with a DSL. Should staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff / parents can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. This could include a discussion with parents about a School Nurse Referral. Staff can refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

27. LGBT or gender questioning pupils

Some pupils may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, bi-phobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness.

Several studies also evidence that LGBT+ young people may be at increased risk of becoming victims of CSE. The fact that a child or a young person 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. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff are aware of the increased risk factors and know how to access appropriate support for these young people when required. We must endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Staff will take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Staff will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs. Schools are not to initiate any action regarding children questioning their gender; where a child or their parent raises a request relating to social transition the DSL will seek further advice on how best to support.

28. Online Safety

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Reviews are carried out by the DSL responsible for filtering and monitoring, with IT support. This includes checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks. The leadership team and relevant staff have an awareness and understanding of the provisions in place, how to manage them effectively and how to escalate concerns when identified.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community (see separate mobile phone policy)
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- ✓ **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- ✓ **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- ✓ **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- ✓ **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel pupils, students or staff are at risk, please speak to the DSL/DDSL, also can report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. Children are also taught about safeguarding, including safety online.

Any mobile devices (phones or smart watches) that have access to the internet are not allowed in the classroom. Children in Y5 and Y6 need to follow the Mobile Devices Policy and surrender these to the office at the start of the school day.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

29. Children in Care (CiC), Post Children in Care and Young Carers

Our school's designated member of staff works in partnership with the Virtual School on how funding can best support the progress of a CiC. The name of the Virtual Headteacher is Emma Thomas Emma.Thomas@dudley.gov.uk

We will ensure that staff have the skills, knowledge and understanding to keep Children in Care and previous Children in Care safe. We will ensure that:

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

We have appointed a designated teacher, **Kate Trueman-Brown (Deputy Head)** who is responsible for promoting the educational achievement of Children in Care and previous Children in Care in line with [statutory guidance](#).

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

Our School is aware of the needs of young carers, we recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Through early identification we will ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

As part of their role, the designated teacher will:

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

30. Children with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

31. Children with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline and can also be victims of sexual violence and harassment. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for pupils with SEN and disabilities. All staff at Howley Grange Primary School will ensure these pupils in their care are identified and take additional care to keep them safe. Clarification around pupils with SEND can be sought from the SENDCo, Miss Williams.

Safeguarding concerns would not usually arise solely from an incident involving a pupil's medical condition or allergy. A referral should only be considered where the incident suggests the pupil may be at increased risk of neglect, abuse or exploitation due to their medical condition. For example, this may be where important medical information is withheld from the school or a pupil is repeatedly sent to school without essential medication, placing them at risk.

32. Collection of pupils and non-collection of pupils at the end of the session/day

Howley Grange Primary School is committed to safeguarding our children and young people and as such, we have a specific attendance policy outlining our procedures in more detail. This is available on our school website. All children from Reception to Year 4 have to be collected by an adult with parental responsibility unless the parent has given advance notice to school staff a different responsible adult will be collecting. This is also the case for children in Year 5 and 6, however they are also allowed to leave school site to walk home alone providing parents have given prior permission via our walking home guidance. If no one arrives to collect a pupil they will be kept safe on school site with a member of staff while contact is made using the emergency contacts provided.

33. Safer Recruitment Procedure

Howley Grange Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children. The recruitment steps outlined below are based on Keeping Children Safe in Education 2026. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. This also applies to any volunteers who will undertake regulated activity in our setting.

Regulated Activity

A person will be engaging in regulated activity with children if they work on a frequent basis in our school, or in connection with the purposes of our school, where the work gives opportunity for contact with children. A person will also be in regulated activity if, as a result of their work or volunteering, they:

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

Advertising

When advertising roles, including those of a voluntary nature, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken

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

Application forms

Our application forms will:

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

Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true.

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

Seeking references and checking employment history

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

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records check for overseas applicants
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

Separate barred list checks will be carried out in the following circumstances:

- Newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available and where other relevant checks have been completed
- Individuals that have worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than 3 months prior to their appointment to the school

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Self-employed individuals

Any self-employed individuals working in our school will need to obtain a DBS check if one is not available. We will request to see the certificate if the individual has obtained their own check so to ensure that the DBS check is at our required level.

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school. For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

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

Governors

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

34. Procedure for dealing with Allegations about Staff - Concerns about a staff member, supply teacher, trainee teacher or volunteer

This is not the responsibility of the Designated Safeguarding Lead.

The **Headteacher** will deal with allegations made against school staff.

In the event of the allegation being made against the **Headteacher**, the **Chair of Governors** is to be notified.

Howley Grange Primary School will follow the 'Managing Allegations Against Staff or Volunteers' (DSPP Procedures) in conjunction with part four of Keeping Children Safe in Education 2026. This includes new information added in relation to Managing Allegations criteria, so schools must work with other agencies to investigate when a member of staff has **“behaved or may have behaved in a way that indicates they may not be suitable to work with children”** Howley Grange will ensure allegations against supply teachers are dealt with appropriately when they are not the employer. We will not simply cease to use this teacher. Processes are developed to manage this akin to the disciplinary procedure and the school will advise supply agencies of its process for managing allegations.

All staff have access to the counselling service within Dudley Council.

If any concerns or allegations made against a members of staff, supply teacher or volunteer are brought to the headteacher, in the first instance these will be discussed with the Designated Officer for Managing Allegations (DO-**Yvonne Nelson Brown and Sukhchandan Kaur**) or duty Independent Reviewing Officer. It is useful at this stage to also provide full names of the member of staff and child involved in the allegation, their dates of birth, addresses and details of any previous concerns, as this will avoid delay. All allegations against people who work with children will be passed on to the Designated Officer (Managing Allegations) in accordance with the Working Together to Safeguard Children (2026) and the DSPP Safeguarding Children Procedures. A Managing Allegations Referral form will need to be completed. The parents or carers of the child will be contacted as soon as possible following advice from the Social Care Team.

If an allegation is made against any governor, including the Chair of Governors, the Headteacher will contact the LA appointed Designated Officer.

- if any allegation is made a quick resolution will be a clear priority; any unnecessary delays will be eradicated
- in response to an allegation all other options will be considered before suspending a member of staff;
- allegations that are found to be malicious will be removed from the personnel records
- pupils that are found to have made malicious allegations are likely to have breached school behaviour policies; the school will therefore consider the appropriate sanction
- we as the employer have a duty of care to all staff; support for the individual is the key to fulfilling this duty
- when an allegation is made it is extremely important that every effort is made to maintain confidentiality
- after any allegations of abuse have been made, the outcome will be categorised as either substantiated, malicious, false, unsubstantiated or unfounded

In addition to this, Howley Grange Primary School have routine systems for continually monitoring the performance of staff ensuring compliance with both child protection procedures and the code of good practice. All staff within Howley Grange Primary School will adhere to the Guidance for Safer Working Practice for those working with Children and Young People in Educational Settings (2019). This covers a wide range of issues around staff conduct.

Action if there are concerns

Concerns about poor practice:

- If, following consideration, the allegation is clearly about poor practice, the Headteacher will deal with it as a misconduct issue.
- If the allegation is about poor practice by the Designated Safeguarding Lead, or if the matter has been handled inadequately and concerns remain, it will be reported to the Headteacher/Chair of Governors who will decide on whether disciplinary action will be taken and the next steps to take.

Action if the concern does not meet the harm threshold

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold – low level concerns) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold (see Part Four - Section one of KCSIE 2026). 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.

All low-level concerns should be reported in the same way; to the Headteacher, unless it is about the Head Teacher and then it should be the Chair of Governors. It should then be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. This record will then be kept confidential, held securely in a locked cupboard, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should 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, in which case it should be referred to the LADO.

35. Whistleblowing

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

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, will be in place for such concerns to be raised with the school's senior leadership team.

If staff have concerns about a fellow colleague, they will follow the Whistle Blowing Procedures.

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

General guidance can be found at: Advice on whistleblowing <https://www.gov.uk/whistleblowing> or via Dudley's whistleblowing policy.

The NSPCC whistleblowing helpline **0800 028 0285** is available as an alternative <https://www.gov.uk/government/news/home-office-launches-child-abuse-whistleblowing-helpline>

Where a staff member feels unable to raise an issue with the school's senior leadership team, or feels that their genuine concerns are not being addressed,

36. Safeguarding in the Curriculum

Child Protection and wider child safety issues will be addressed through the curriculum as appropriate, especially in Personal, Social and Health Education (PSHE), Information and Communication Technology (ICT), Citizenship and Sex and Relationships Education. Children are taught to recognise when they are at risk and how to get help when they need it.

37. Other areas of our work

All our policies which address issues of power and potential harm, for example bullying, equal opportunities, physical handling, confidentiality, positive behaviour, safer recruitment. This policy will be read in conjunction with all other linked policies and guidance to ensure a whole school approach.

Our Child Protection policy cannot be separated from the general ethos of the school, which will ensure that pupils are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

38. Complaints Procedure

Information regarding the complaints process at Howley Grange can be accessed via the school website.

39. Implementation, review and monitoring

Implementation will take place by ensuring this policy is discussed at the full governing body meeting and ensuring all staff are made aware of its existence.

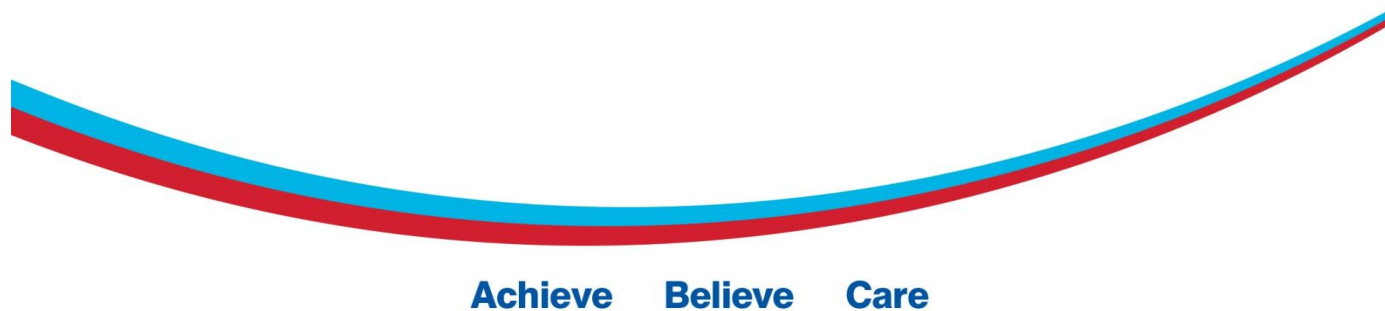
This Policy will be monitored and reviewed on an annual basis and whenever significant changes to legislation, guidance or changes to local procedures require it. The cover page of this policy states the dates of review ratification by the Governing Body.

Supporting Documents

- DSPP Safeguarding Children Procedures <http://dudleysafeguarding.org.uk/>
- Working Together to Safeguard Children (2026)
- Keeping Children Safe in Education (2026)
- Safer Working Practice Guidance (Feb 2022)

Date of Review September 2026 (K Trueman-Brown)

Date of next review September 2027



APPENDIX 1

Form for recording and reporting concerns about a child (double sided with body map)

<u>Form for recording and reporting concerns about a child</u>		
Full name of child:	Class:	Year:
Date of birth (if known):		
Your name:	Position:	
Date and time of incident/disclosure/concern:		
Please provide details of the incident/disclosure/concern, including times, dates, description of injuries (body map included yes/no), and, if applicable, exact words spoken by the child (please continue on additional numbered pages if needed):		
Signed:	Time and date of reporting:	
Name of staff member reported to:	Further action taken by staff member:	
Signed:	Date:	
Any other information helpful for referral (to be completed and discussed with pastoral team/designated safeguarding lead). Include academic progress, attendance, behaviour, presentation, peer relationships and parental knowledge:		

