Transforming Lives

EDUCATIONAL TRUST

Child Protection & Safeguarding Policy

September 2026

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1 – The TLET Way

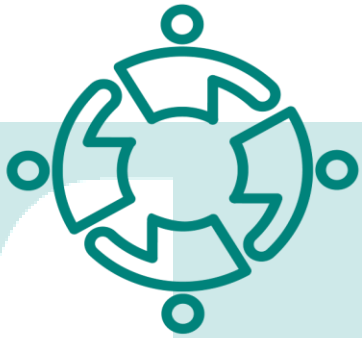
Transforming Lives Educational Trust (TLET) is a family of academies. Every TLET policy is rooted in and reflects our ambitions for pupils, students and wider stakeholders alike.

OUR AMBITIONS -
As a Trust family, our shared ambitions drive everything we do, we call this 'The TLET Way'.

Through the transformative values of courage, kindness and loyalty, together we:

NURTURE POTENTIAL

We flourish in the places we create together.



INSPIRE COMMUNITY

We champion each other to make a difference.

DELIVER EXCELLENCE

We strive to achieve our best.

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1. Glossary

For this document the following terminology should be considered:

Safeguarding is the overarching term for everything done to support children and young people, keep them safe, and promote their welfare. It encompasses the full spectrum of measures to prevent harm, promote wellbeing, and ensure children are able to achieve their best outcomes.

Keeping Children Safe in Education 2026 defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Child protection, as defined in 'Working Together to Safeguard Children (2026)', refers to the activity undertaken to protect individual children who are suffering, or are likely to suffer, significant harm. This includes timely assessment, intervention, and referral to statutory services where necessary.

Safeguarding extends beyond child protection and includes:

- promoting children's health and wellbeing, including mental health;
- preventing harm from all forms of abuse, neglect, exploitation, or radicalisation;
- ensuring online safety and protection from digital risks;
- early identification and support for children with additional needs (early help);
- addressing risks in the wider environment (contextual safeguarding); and
- listening to children's voices and involving them in decisions affecting their welfare.

Staff refers to all those working for or on behalf of the school/setting, full time or part-time, temporary or permanent, in either a paid or voluntary capacity.

DSL refers to the Designated Safeguarding Lead at the school/setting)

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example, stepparents, foster carers and adoptive parents.

Extra Familial Harm - Extra-familial harm refers to abuse or exploitation occurring outside the family environment. **Contextual safeguarding** refers to the approach used to understand and respond to the wider relationships, environments and circumstances in which such harm occurs.

Early Help is increasingly used in national policy to describe support provided to children and families as soon as needs or problems emerge. In Warwickshire, early intervention is referred to as **Early Support**, which may increase to **Targeted Early Support** where additional coordinated support is needed. Where statutory intervention is required, children may receive **Family Help** support as **children in need under section 17 of the Children Act 1989**, or the local authority may make **section 47 enquiries** where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Please refer to **The Spectrum of Support** for details.

2. Introduction

At TLET are committed to safeguarding children and young people, and we expect everyone who works in our school's to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. **We will always act in the best interest of the child.**

All staff working in or on behalf of Houlton School, including those who do not work directly with children, are expected to read and understand at least **Part One of Keeping Children Safe in Education 2026**. The academy will ensure that appropriate arrangements are in place to support staff to understand and discharge their safeguarding responsibilities.

This policy should also be read alongside section 3 of the Early Years Foundation Stage statutory framework.

This policy forms part of the Houlton School wider safeguarding framework and **should be read alongside:**

- TLET Safeguarding Policy and Child Protection Policy;
- TLET Staff Code of Conduct;
- Houlton School Behaviour Policy;
- Houlton School Online Safety Policy;
- Department for Education, Keeping Children Safe in Education 2026;
- Department for Education, Working Together to Safeguard Children 2026;
- the Early Years Foundation Stage statutory framework, where applicable; and
- the local safeguarding partners' multi-agency safeguarding arrangements, threshold documents and referral procedures.
- Houlton School Physical Restraint and Intervention Policy.

This policy has regard to the following principal legislation:

- Children Act 1989;
- Children and Social Work Act 2017;
- Data (Use and Access) Act 2025;
- Education (Independent School Standards) Regulations 2014;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Data Protection Act 2018 and UK General Data Protection Regulation;
- Children's Wellbeing and Schools Act 2026;
- Children Act 2004;
- Education Act 2002;
- Crime and Policing Act 2026.

3. Key Staff and Contacts

Role	Contact details
Executive Principal	Paul Brockwell
Head of School	Lorna Pountney
Designated Safeguarding Lead	Sian Warde
Deputy Designated Safeguarding Lead (s)	Zoe Cleaver, Lianne Hoult, Lydia Mehta, Charm Hingulage, Peter de Brissac Bernard, Angela Lancini, Lorna Pountney, Sophie Cunliffe.
eSafety Lead	Sian Warde, Mark Hart
Prevent Duty Lead	Sian Warde
Attendance Champion	Diana Ichim, Hollie Tomlinson
Mental Health / Self Harm Lead	Sian Warde, Lydia Mehta
Designated Teacher for Looked After and Previously Looked After Children	Sian Warde, Zoe Cleaver, Hannah McHale
Designated Teacher with responsibility for Young Carers	Sian Warde
Designated Security Lead (Martyn's Law)	Sian Warde
Nominated Safeguarding Governor	Liz Cheney
The above can be contacted via the school's office on 01788 593300	

Other useful contacts

Agency / Contact	Contact Details
Children's Social Care - **FAMILY CONNECT**	PHONE: **01926 414144**
Emergency Duty Team (OUT OF OFFICE HOURS) contact)	01926 745376
The Local Authority Designated Officer (LADO)	EMAIL lado@warwickshire.gov.uk CONTACT NUMBER: **01926 745376** Position of Trust MARF (DOCX, 1.53 MB)
NSPCC Whistleblowing Advice Line	Call 0800 028 0285
INSERT ANY OTHER MULTI-ACADEMY TRUST or LA Contact	
Trust Safeguarding Lead – Beci Duck | 01788 593900 |	

4. Staff roles

Designated Safeguarding Lead (DSL)

Our school's Designated Safeguarding Lead (DSL), is a substantive member of the Senior Leadership Team and has the authority, time, training and resources necessary to fulfil the responsibilities of the role.

During term time, the DSL or an appropriately trained deputy will always be available during working hours for staff to discuss safeguarding concerns. Robust cover arrangements will be maintained during periods of illness, leave or other absence. These arrangements may include a confidential safeguarding mailbox or another secure communication system monitored by appropriately trained DSLs or deputy DSLs.

Appropriate DSL cover will also be available for activities taking place outside normal working hours or during school holidays. Where necessary, availability may be provided remotely by telephone, video call or other secure means of communication.

The DSL:

- is a senior member of the school's leadership team and has the status and authority required to carry out the duties of the role, including committing resources and supporting and directing staff;
- takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place at the school.
- is provided with the time, funding, training, resources and support necessary to carry out the role effectively;
- maintains oversight of the Academy's safeguarding picture and ensures that deputy DSLs have access to the information required to undertake their responsibilities;
- acts as a source of advice, support and expertise to staff on child welfare, safeguarding and child protection matters;
- has a good working knowledge of local safeguarding procedures and acts as a point of contact with the safeguarding partners;
- ensures that all staff have access to and understand the school's child protection policy and procedures, with particular attention given to new and part-time staff (and volunteers).
- links with the local safeguarding partner arrangements (Warwickshire Safeguarding Children's Partnership (WSCP) to ensure staff are made aware of relevant training opportunities and the latest local safeguarding policies and procedures;
- undertakes role-specific training at least every two years, including Prevent awareness training, and refreshes their knowledge and skills at regular intervals and at least annually;
- understands the assessment process for providing Early Help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- understands the relevant referral arrangements for child criminal exploitation, child sexual exploitation, trafficking and modern slavery, including the National Referral Mechanism where appropriate;
- makes, or supports staff to make, referrals to local authority children's social care, the police, the Prevent programme and other relevant agencies, as appropriate;
- supports staff throughout the referral and assessment process and ensures that the school provides appropriate information and assistance to children's social care and other agencies;
- keeps safeguarding cases under review and ensures that concerns are reconsidered or escalated where risks increase, the child's circumstances do not improve, or the support provided is not meeting the child's needs;
- keeps detailed, accurate, secure and up-to-date records of all safeguarding concerns, discussions and decisions, including the action taken, advice received, outcomes and rationale for making or not making a referral;
- ensures that child protection records are stored securely, accessed only by those who need to see them and managed in accordance with data protection and information-sharing requirements;
- ensures that when a pupil leaves the school their child protection file is transferred separately from the main pupil file, through secure means, and that confirmation of receipt is obtained;

- ensures that child protection files are transferred within five days of an in-year transfer or within the first five days of the start of a new term;
- considers whether relevant safeguarding information should be shared with a receiving school in advance, particularly where it is needed to assess risk to the child or others and to establish appropriate safety and support arrangements;
- attends and contributes effectively to strategy discussions, child protection conferences, review conferences and other relevant multi-agency meetings;
- coordinates the school's contribution to child protection plans, assessments and other multi-agency safeguarding arrangements;
- liaises as appropriate with the Executive Principal/Head of School the Trust or LA, the case manager, the LADO, children's social care, the police and other relevant agencies;
- liaises with relevant school's staff, including pastoral leaders, the SENCO, attendance staff, IT staff and the senior mental health lead, so that children's needs are considered holistically;
- liaises with the senior mental health/self-harm lead, the Mental Health Support Team where available, and relevant external services where safeguarding concerns are linked to a child's mental health;
- promotes supportive engagement with parents and carers in safeguarding and promoting children's welfare, unless doing so may place a child or another person at increased risk or compromise an investigation;
- understands the circumstances in which a child is entitled to an Appropriate Adult under Code C of the Police and Criminal Evidence Act;
- works with attendance staff and relevant agencies to identify and respond to safeguarding concerns associated with repeated or prolonged absence from education, making referrals where appropriate;
- works with the Executive Principal/Head of School and relevant strategic leaders to promote the educational outcomes of children who have or have had a social worker and/or who are vulnerable;
- promotes a culture in which children are listened to, and their wishes and feelings are considered when decisions are made about their safety and welfare;
- ensures that the child protection policy and its implementation are reviewed at least annually and updated regularly in partnership with the governing body or proprietor; and
- ensures that the child protection policy is publicly available and that parents and carers understand the school's role in making safeguarding referrals.

Deputy Designated Safeguarding Lead (Deputy DSL)

Our **Deputy** Designated Safeguarding Lead(s) is/are: Zoe Cleaver, Lianne Hoult, Lydia Mehta, Charm Hingulage, Peter de Brissac Bernard, Angela Lancini, Lorna Pountney, Sophie Cunliffe.

The Deputy DSL(s):

- are trained to the same standard as the DSL and receive the same regular safeguarding updates;
- support the DSL in carrying out the safeguarding and child protection responsibilities set out in this policy;
- have access to the safeguarding information and systems necessary to discharge their responsibilities effectively;
- act as a source of advice and support to staff on safeguarding and child protection matters; and
- carry out the necessary functions of the DSL during periods of absence to ensure the ongoing safety and protection of pupils.

Where the DSL is absent for a prolonged period, an appropriately trained Deputy DSL will undertake the day-to-day functions of the role in accordance with the academy's agreed cover arrangements.

Although safeguarding duties may be delegated to appropriately trained deputies, the DSL retains ultimate lead responsibility for safeguarding and child protection. This responsibility must not be delegated.

The responsibilities of the DSL and Deputy DSL(s) are clearly set out in the relevant postholders' job descriptions.

The Multi-Academy Trust

The Trust Safeguarding Lead is Beci Duck.

TLET will ensure that:

- Each school appoints a Designated Safeguarding Lead (DSL) who is a member of the senior leadership team and who has undertaken role-specific training;
- the DSL (and Deputy DSL) role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer;
- the DSL, Deputy DSL or Trust Safeguarding Lead is always available during normal school hours to discuss any safeguarding concerns and that a nominated DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term school activities or educational visits;
- each school follows current safer recruitment procedures that include statutory checks on the suitability of staff to work with children;
- a training curriculum is available that ensures all staff, including the Executive Principal, Heads of School, and volunteers receive appropriate and regular, safeguarding and child protection training and updates as required (at least annually). This includes ensuring that the DSL receives refresher training and regular updates as defined under the DSL's duties above;
- each school refers to the Chair of Governors or nominates a Trust leader to be responsible for consulting with the Local Authority Designated Officer (LADO) and other agencies in the event of an allegation being made against the headteacher/principal.[1]

Where required, the Trust Safeguarding Lead is deputised by an alternate nominated DSL and carries the authority, and delegated powers of the Multi-Academy Trust when doing so.

The Executive Principal/Head of School will:

- ensure that the child protection policy and associated safeguarding procedures are understood and implemented consistently by all staff;
- ensure that all staff, including those who do not work directly with children, read and understand at least **Part One of** *Keeping Children Safe in Education* 2026 and receive appropriate support to understand their safeguarding responsibilities;
- allocate sufficient time, funding, training, support and resources, including robust cover arrangements, to enable the DSL and Deputy DSL(s) to carry out their roles effectively, including attending strategy discussions, child protection conferences and other relevant meetings;
- ensure that appropriate and confidential DSL cover arrangements are maintained during illness, leave, other absence and academy activities taking place outside normal academy hours;
- support the designated teacher for looked-after and previously looked-after children to promote the educational achievement of children who are looked after by the local authority, have left care through adoption, special guardianship or child arrangements orders, or were adopted from state care outside England and Wales;
- ensure that staff have the knowledge, skills and understanding necessary to safeguard and support looked-after and previously looked-after children, children with a social worker and children in kinship-care arrangements;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that concerns are responded to sensitively and in accordance with the Trust's whistleblowing procedures;
- promote an open and transparent safeguarding culture in which concerns about children and adults are reported, recorded, reviewed and acted upon promptly;
- ensure that the culture of the school supports effective pastoral care, universal and community-based Early Support and targeted support through Targeted Early Support or Family Help;
- ensure that staff provide appropriate information and assistance to social workers and other agencies when children's social care becomes involved;
- ensure that pupils are provided with age-appropriate opportunities throughout the curriculum to learn

[1] Contact details can be found in section 2 of this policy.

about safeguarding and how to keep themselves and others safe, including online;

- ensure that clear roles and responsibilities are assigned for filtering and monitoring and that the effectiveness of the Trust's filtering and monitoring arrangements is reviewed at least once every academic year by the responsible member of the Senior Leadership Team, supported by the DSL and IT staff or provider, with a record retained of the checks undertaken;
- ensure that appropriate safeguarding due diligence is undertaken before commissioning alternative provision and that placements, provider arrangements and safeguarding risks are kept under regular review;
- ensure that allegations or concerns which may meet the harm threshold concerning staff, supply teachers, trainee teachers, volunteers or contractors are reported to the appropriate case manager and discussed with the **Local Authority Designated Officer** without delay, and within one working day, before any internal investigation is commenced;
- ensure that low-level concerns about adults working in or on behalf of the school are reported, recorded, reviewed and managed in accordance with this policy and the staff code of conduct;
- ensure that referrals are made to the Disclosure and Barring Service as soon as possible where the statutory referral criteria are met, including where a member of staff or volunteer is removed from regulated activity or leaves before they can be removed;
- ensure that referral to the Teaching Regulation Agency is considered where a teacher has been dismissed, or would have been dismissed had they not resigned, because of serious misconduct;
- ensure that relevant staff are made aware of the requirements of the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, including their responsibility to disclose relevant information;
- ensure that safeguarding policies, procedures and practice are reviewed regularly and updated in response to changes in statutory guidance, legislation, local arrangements, emerging risks and lessons from safeguarding incidents; and
- provide the governing body, trust or proprietor with sufficient information and assurance to enable it to scrutinise the effectiveness of the school's safeguarding arrangements and confirm that those arrangements are implemented in practice.

The Trust Board will:

- identify a named individual to take responsibility for oversight of the school's safeguarding arrangements. This colleague will maintain regular contact with the DSL and will ensure that the Local Governing Board receives regular reports about safeguarding activity at each school.
- ensure that the academy safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.
- ensure the school's Safeguarding Policy is aligned with the trusts oversight of safeguarding arrangements.

5. Allegations and Safeguarding concerns about staff or volunteers

This section applies to concerns or allegations about any adult working in or on behalf of the school, including members of staff, supply teachers, trainee teachers, volunteers and contractors.

All concerns about adults, no matter how small, must be reported without delay and managed in accordance with this policy and the Staff Code of Conduct.

Concerns and allegations will be considered under one of the following procedures:

- concerns or allegations that may meet the harm threshold; or
- concerns or allegations that do not meet the harm threshold, referred to as low-level concerns.

Where a concern relates to a supply teacher, trainee teacher, contractor or another person provided by a third-party organisation, the school and the relevant agency, employer or training provider share safeguarding responsibilities. The school will take the lead in protecting children, establishing the immediate facts and managing the safeguarding process. The agency, employer or training provider will normally lead any related employment, disciplinary or training process.

The school will not cease to use the services of a supply teacher, trainee teacher or contractor solely as an alternative to properly considering and managing a safeguarding concern or allegation. KCSIE 2026 expressly extends Part Four to trainee teachers and clarifies the shared responsibilities between schools and third-party organisations.

5.1 A concern or allegation may meet the harm threshold where an adult has:

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

then a referral will be made to the LADO[2], without delay.

The final criterion includes behaviour that may have occurred outside the school. Dependent on the behaviour, this also may indicate that the individual is unsuitable to work with children. This is sometimes referred to as transferable risk.

Staff must share, without delay, any concern or allegation that may meet the harm threshold with the Executive Principal / Head of School.

Name	Role	Contact Number
Paul Brockwell	Executive Principal	01788 593300
Lorna Pountney	Head of School	01788 593300

A "case manager" will be nominated to lead any investigation. Where the Head of School is the subject of an allegation the Executive Principal will oversee that case management, or, where the Executive Principal is the subject of an allegation, a nominated member of the Trust's Executive Team will oversee that case management.

[1] LADO Contact details can be found in section 2 of this policy.

The case manager will undertake only those initial enquiries necessary to establish the basic facts. No substantive internal investigation will begin until **advice has been sought from the LADO.**

Where a concern relates to a supply teacher, trainee teacher, contractor or another person provided by a third-party organisation, the relevant agency, employer or training provider will be informed and involved in the process.

Where the concern or allegation relates to the Executive Principal, it must be reported without delay to:

Name	Role	Contact Number
Jo Thomas	Chair to the Local Governing Board	01788 593900
Beci Duck	Trust Safeguarding Lead	01788 593900

Where colleagues are unsure whom to report a concern to, believe that the concern has not been dealt with appropriately or consider that there may be a conflict of interest, they may contact the LADO directly.

Concerns about the Chair of the Governing Body, Chair of Trustees or a member of the Central Team must be reported in accordance with Whistle-Blowing Policy and, where appropriate, directly to the LADO.

5.2 Allegations or safeguarding concerns that do not meet the harm threshold: low-level concerns

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are reported, recorded and dealt with promptly and appropriately.

The term **low-level concern** does not mean that the concern is insignificant. A low-level concern is any concern, no matter how small, including 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 work; and
- not behaved in a way that meets the harm threshold.

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

- being overfriendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area, behind a closed door or via online platforms (including messaging, social media, gaming, video calls or other digital communication platforms / methods without a clear professional purpose, appropriate oversight, and compliance with organisation safeguarding procedures;
- humiliating pupils;
- using inappropriate language towards children; or
- failing to maintain appropriate professional boundaries.

Low-level concerns may arise through a concern raised by a child, parent, member of staff or another adult, an observation of an adult's behaviour, information identified through safeguarding or recruitment checks, or a self-referral by the adult concerned.

Low-level concerns about an adult working in or on behalf of the school must be reported without delay to Executive Principal/Head of School, using a yellow form in accordance with Trust policy and procedure. In their absence, it must be reported to the DSL or Deputy DSL.

Name	Role	Contact Number
Sian Warde	DSL	01788 593900

The Executive Principal/Head of School will be the ultimate decision-maker in relation to low-level concerns. Advice must be sought from the Trust DSL, TLET HR or the LADO where appropriate and the appropriate Trust's procedures fulfilled.

Where there is any doubt about whether a concern is low-level or may meet the harm threshold, advice will be sought from the LADO.

Where a low-level concern relates to the Designated Safeguarding Lead, it must be reported directly to the Executive Principal of Head of School.

5.3 Allegations or low-level concerns relating to the Executive Principal or the Head of School

If the allegation or concern relates to the Executive Principal or Head School, it should be reported, without delay, to the following:

Executive Principal		
Name	**Role**	**Contact Number**
Paul Brockwell	Chair of Governors	01788 593900
Beci Duck	Trust Safeguarding Lead	01788 593900
Head of School		
Name	**Role**	**Contact Number**
Lorna Pountney	Executive Principal	01788 593900

- Concerns about a member of the Trust or Governing Body Team must be directed to the Chief Executive Officer
- Concerns about the Chief Executive must be directed to the Chair of Trustees.
- Concerns about the Chair of Trustees must be directed to the Vice-Chair of Trustees, Governance Professional and, where appropriate, to the LADO.

All low-level concerns will be recorded in writing/electronically and retained securely. Records will include details of the concern, the context in which it arose, the decision reached, the reasons for that decision and any action taken.

Low-level concerns will be reviewed at Trust level to identify any patterns of inappropriate or concerning behaviour. Where a pattern is identified, the school will consider whether the matter should be managed under disciplinary procedures, whether the harm threshold may be met, whether the LADO should be consulted, or whether wider policy, practice, culture or training issues need to be addressed.

6. Staff Training

All staff, including those who do not work directly with children, will read and understand Part One of Keeping Children Safe in Education 2026. A copy of Part One and the academy's relevant safeguarding policies will be provided to all staff as part of their induction. (They will also receive a copy on the new Part one Overview for Staff).

All staff will receive appropriate safeguarding and child protection training, including online safety, at induction. This training will be regularly updated. Staff will also receive safeguarding and child protection updates throughout the year, as required, and at least annually.

All staff will undertake safeguarding training each September, covering as a minimum:

- the roles and responsibilities of all staff in safeguarding and promoting the welfare of children;
- the identity and role of the DSL and Deputy DSL(s), and the school's procedures for reporting and escalating concerns;
- the signs and indicators of abuse, neglect, exploitation and modern slavery, including an understanding that safeguarding concerns frequently overlap;
- the local procedures and criteria for universal and community-based Early Support, targeted early help through Family Help, section 17 children-in-need services and section 47 child protection intervention;
- how to respond when a child discloses abuse, neglect or exploitation, including confidentiality and appropriate information sharing;
- the school's safeguarding response to children who are absent from education, particularly where absence is repeated or prolonged;
- the school's Behaviour Policy and Staff Code of Conduct;
- allegations and safeguarding concerns about adults, including low-level concerns, transferable risk and whistleblowing arrangements;
- child-on-child abuse, including harmful sexual behaviour, sexual harassment, sexual violence, misogyny, misandry, serious physical violence and threats involving weapons;
- child sexual exploitation, child criminal exploitation, county lines, trafficking and modern slavery;
- recognising and responding to concerns relating to female genital mutilation, forced marriage and honour or faith-based abuse;
- recognising and responding to concerns relating to radicalisation and the Prevent duty;
- online safety, including the academy's filtering and monitoring systems, generative artificial intelligence, deepfakes, harmful online content and the making or sharing of nudes and semi-nudes, including AI-generated images; and
- mental health concerns that may also be safeguarding concerns, including self-harm, eating disorders, suicidal ideation and suicide risk.

All staff will be made aware that some children may face additional barriers to recognising or reporting abuse or may be at greater risk of harm. This includes children with special educational needs or disabilities, children with medical conditions, looked-after and previously looked-after children, children with a social worker, young carers, children who are pregnant or are parents themselves, and children who experience repeated suspension, classroom removal, part-time timetables or prolonged absence from education.

The school will ensure that staff understand their individual responsibilities in relation to filtering and monitoring and know how to report concerns arising from the use of technology. Online safety will be treated as an integral part of safeguarding and will be included within relevant staff training and updates.

Staff will be required to confirm that they have received, read and understood the relevant safeguarding guidance, policies and training. The school will provide additional training, guidance or support where a member of staff requires further help to understand or discharge their safeguarding responsibilities.

Volunteers will receive safeguarding induction and training appropriate to their role, their level of contact with children and the responsibilities they undertake.

The DSL and Deputy DSL(s) will undertake formal role-specific training at least **every two years.** This will include up-to-date information about **local safeguarding partner arrangements**, assessment and referral processes, Early Support, Family Help, statutory intervention and relevant multi-agency procedures.

In addition, the DSL and Deputy DSL(s) will refresh their knowledge and skills at regular intervals, and at least annually, to keep up to date with developments relevant to their role. They will be supported to access inter-agency training and continuing professional development.

Governors and trustees will receive appropriate safeguarding and child protection training, including online safety, at induction. This training will be updated regularly and, as a school requirement, at least annually, to enable governors/trustees to provide effective strategic challenge and assurance regarding the school's safeguarding arrangements.

7. Safer recruitment

TLET and our school complies with the requirements of Keeping Children Safe in Education 2026 and the arrangements of the local safeguarding partners. We operate safer recruitment procedures to help deter, reject or identify people who may pose a risk of harm to children.

The Trust will carry out all required pre-appointment checks and will verify, as appropriate, an applicant's identity, right to work in the UK, qualifications, employment history, references, mental and physical fitness, criminal record information and suitability to work with children.

- At least one member of each recruitment panel will have completed safer recruitment training.
- The academy obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked.
- Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.
- The school maintains a single central record of recruitment checks undertaken.
- The school will not knowingly allow a barred person to engage in regulated activity with children.
- Where a trainee teacher is fee-funded, the training provider will be responsible for undertaking the required checks. The school will obtain written confirmation that the checks have been completed and that the trainee has been judged suitable to work with children.

The Executive Principal/Head of School will ensure that relevant staff are made aware of the requirements relating to disqualification under the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, including their obligation to disclose relevant information.

7.1 Volunteers

All volunteer roles will be assessed before the individual begins work. The school will determine whether the role amounts to regulated activity and what checks are required.

From 1st September 2026, a volunteer who **teaches, trains, instructs or supervises** children frequently, on more than three days in any 30-day period, or overnight, will be regarded as **engaging in regulated activity,** even where they are supervised. In these circumstances, the school will obtain an **enhanced DBS check with children's barred-list information** before, or as soon as practicable after, the volunteer begins the role.

A volunteer **will not** undertake regulated activity until their children's barred-list status has been confirmed. The school will review the roles of existing volunteers to identify any individual who becomes engaged in regulated activity because of the changes introduced from 1 September 2026. Where this applies, the school will check the individual's children barred-list status, obtain the appropriate DBS check and record this in the Single Central Record.

Where a volunteer meets the frequency requirement through volunteering across more than one school or setting, the school will work with the other settings to determine which organisation will obtain the enhanced DBS check with children's barred-list information.

Where a volunteer is **not engaged in regulated activity**, the school will undertake and record a written risk assessment to determine what checks, if any, are appropriate.

The assessment will take account of:

- the nature of the work with children;
- the level and frequency of contact with children;
- what is known about the volunteer, including information provided by staff, parents, referees or other volunteers;
- whether the individual undertakes other paid or voluntary work where a referee can comment on their suitability; and
- whether an enhanced DBS check without barred-list information, or another level of check, is appropriate.

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or permitted to undertake regulated activity.

Where the statutory criteria are met, the school will make a referral to the Disclosure and Barring Service in relation to a volunteer who is removed from regulated activity, or who ceases volunteering before they can be removed.

7.2 Third-Party staff (Contractors)

The school will ensure that contractors and other third-party staff working on the premises have undergone the appropriate checks for the work they will undertake.

Where a contractor will engage in **regulated activity**, an enhanced DBS check with children's barred-list information will be required.

Where a contractor will **not engage in regulated activity but** will have the opportunity for regular contact with children, an enhanced DBS check without barred-list information may be required.

Where a contractor has not undergone the appropriate checks, they will **not be permitted to work unsupervised or** undertake regulated activity while children are present.

The school will:

- obtain written confirmation from the contractor's employer that the appropriate checks have been completed;
- check the identity of contractors and third-party staff when they arrive at the school; and
- ensure that the individual presenting for work is the same person on whom the checks were completed.

Where a self-employed contractor is engaged, the school will obtain the appropriate check directly or verify that the individual holds a suitable and eligible check at the required level.

Where the school directs a pupil to attend alternative provision, it will **obtain written assurance that adults working with pupils have undergone the appropriate safer recruitment checks.** This assurance does not remove the school's responsibility to undertake its own safeguarding due diligence and keep the placement under review.

7.3 Site security and visitors

Visitors to the school, including contractors, will be required to sign in and will be issued with an identification badge confirming that they have permission to be on the premises. Parents and carers who are only delivering or collecting their children will not normally be required to sign in.

All visitors are expected to comply with the school's safeguarding, conduct and health and safety requirements.

For visitors attending in a professional capacity, the school will check their identity and obtain assurance that the appropriate checks have been completed by their employer, where relevant. The school will **not normally ask to see the DBS certificate** itself **where satisfactory written assurance has been provided.**

The school will not request DBS or barred-list checks for visitors such as children's relatives attending sports days, performances or similar events where those checks are not legally permitted or necessary.

The Executive Principal/Head of School will exercise professional judgement when deciding whether a visitor should be escorted or supervised while on the premises, taking account of the nature and purpose of the visit, the visitor's level of contact with children and any checks that have been completed.

7.4 The Single Central Record

Our Single Central record[3] covers the following people: all staff, including teacher trainees on salaried routes, agency, third-party supply staff who work at the school, volunteers and Governors.

Our Single Central Record is recorded in such a way that allows for details of each individual academy to be provided separately, and without delay, to those entitled to inspect that information, including by inspectors.

[2] The Trust maintains a record of pre-appointment checks carried out for each school under its control, referred to in the Regulations as the register and more commonly known as the 'single central record'. This also includes governors/members and trustees of the academy trust.

8. Extended Academy and off-site arrangements

All extended and off-site activities will be subject to appropriate health, safety and safeguarding risk assessments.

Where activities are provided and managed by the Academy, this child protection policy and the school's safeguarding procedures will apply.

Where another organisation delivers services or activities on the school's premises, we will satisfy ourselves that appropriate safeguarding arrangements are in place, including suitable child protection policies, safer recruitment procedures, and clear arrangements for sharing concerns. These requirements will be included within any transfer of control agreement, and failure to comply may result in the arrangement being terminated. The school will have regard to Keeping Children Safe in Out-of-School Settings.

Where a pupil attends off-site or alternative provision, the school **will remain responsible** for safeguarding and will undertake its own due diligence, including where the provider appears on a local authority approved list.

We will:

- record the provider's address and details of any subcontracted provision or satellite sites;
- obtain assurance that appropriate safeguarding and safer recruitment checks have been completed;
- require the provider to notify the school of any changes that may affect a pupil's safety, including relevant staffing changes;
- maintain effective communication with the provider; and
- review the placement at least half-termly, or immediately where a safeguarding concern arises.

Where safeguarding arrangements are not satisfactory, the school will take appropriate action, which may include suspending or ending the placement.
Where an unregistered provider is used, we will undertake additional checks to assure ourselves that appropriate safer recruitment arrangements are in place. This will include requiring the provider, where this has not already been completed, to obtain confirmation from the Teaching Regulation Agency that any person undertaking teaching work is not subject to a prohibition order or other relevant restriction.

Whenever pupils take part in day trips, residential visits, work experience or other off-site activities, robust safeguarding arrangements will be in place.

8.1 Sport, toilets, changing facilities and showers

The school will manage participation in sport and the use of toilets, changing rooms and showers in accordance with Keeping Children Safe in Education 2026, the Equality Act 2010, the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Where the nature of a sport means that physical strength, stamina or physique creates a safety or competitive disadvantage, pupils may be grouped according to biological sex. Where single-sex provision is necessary for safety, no exceptions will be made. In other circumstances, requests concerning participation will be considered individually, taking account of safety, fairness, the welfare and best interests of the child and other children, and the school's equality and human rights duties.

The school will provide separate toilet facilities for boys and girls where required by law. Pupils will not use toilets designated for the opposite biological sex. Where a pupil does not wish to use the facilities designated for their biological sex, the school will consider whether a suitable self-contained individual facility can be provided without compromising the safety, privacy, comfort or dignity of that pupil or any other child.

Pupils aged 11 or over at the start of the school year will not be required or permitted to undress in front of pupils of the opposite biological sex and will not use changing or shower facilities designated for the opposite sex. Where necessary, the school will consider an alternative fully enclosed facility or use of the facilities at a different time.

Any individual arrangements will be clearly recorded, communicated to relevant staff on a need-to-know basis and reviewed regularly.

8.2 Residential visits and sleeping arrangements

All residential visits, exchanges, sports tours, camps, and other overnight activities will be subject to a documented safeguarding and educational-visits risk assessment.

Children will not share overnight accommodation with children of the opposite biological sex. This applies to shared bedrooms, dormitories, tents, and other communal sleeping arrangements.

Where a child does not wish to share accommodation with children of the same biological sex, the school will consider whether suitable separate accommodation can reasonably be provided. Any alternative arrangement must preserve the safety, privacy, comfort and dignity of the child and all other children.

Sleeping arrangements will be agreed and documented before departure and will not be changed informally by individual staff during the visit. Any safeguarding concern arising during a residential activity will be reported to the visit leader and DSL without delay.

9. Reasonable force and restrictive interventions

There are limited circumstances in which staff may use reasonable force to safeguard a child or another person. Any force used must be no more than is necessary and must be used for the least amount of time.

The school will not operate a blanket “no contact” policy, as this could prevent staff from appropriately supporting or protecting pupils. Decisions about physical contact or reasonable force will be based on professional judgement, the law, and the individual circumstances.

Additional care will be taken where an incident involves a child with special educational needs or disabilities, a mental health need or a medical condition. Staff will consider the child’s additional vulnerability, any reasonable adjustments required and the school’s Public Sector Equality Duty.

Positive and proactive support, including individual behaviour or risk-reduction plans agreed with parents or carers where appropriate, will be used to reduce the likelihood that restrictive intervention becomes necessary.

Any use of reasonable force or restrictive intervention will be recorded and reviewed in accordance with the school’s Behaviour and Restrictive Intervention Policy. Where an incident raises a concern about possible abuse, inappropriate practice, or harm to a child, it will also be managed under this child protection policy.

10. Teaching our pupils about safeguarding

At Houlton School, pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

Through the PSHRE and Personal Development Curriculum (including but not limited to assemblies and wider curriculum links), pupils are taught how to keep themselves safe. Certain elements of this learning are delivered at key points during the academic year (e.g. water warnings before the summer break) or through the appropriate curriculum areas (e.g. Computing), however there is also monthly data analysis which highlights key priorities within our school (e.g. a rise in online abuse) that we then respond to. In addition, the DSL keeps abreast of regional and national developments in Safeguarding and pro-actively implements appropriate measures and interventions to help pupils to understand how to keep themselves safe. Furthermore, we aim to promote responsible citizenship in our pupils through the use of the PRAISE framework and British Values, to establish clear values and a culture of integrity.

11. Educational Outcomes

The DSL will work with the Executive Principal/Head of School, the designated teacher and relevant strategic leads to promote the educational outcomes of children who have, or have had, a social worker.

The DSL will understand the welfare, safeguarding and child protection issues affecting these children and consider the impact that these experiences may have on their attendance, engagement, behaviour, progress and achievement.

This will include:

- maintaining an up-to-date overview of children who have, or have had, a social worker, including their attendance, progress and attainment;
- promoting a culture of high expectations and aspirations for these children;
- supporting teaching and pastoral staff to provide appropriate academic support, pastoral intervention and reasonable adjustments;
- recognising that the impact of abuse, neglect or other adverse experiences may continue after statutory social care involvement has ended; and
- working with children's social care, the Virtual School Head and other relevant professionals, where appropriate, to improve attendance, engagement and educational outcomes.

12. Extra-familial harms - aka Contextual Safeguarding

Extra-familial harm refers to abuse or exploitation that occurs outside a child's family environment. Contextual safeguarding is the approach used to understand and respond to the wider relationships, environments and circumstances in which such harm may occur.

Leaders will assess the risks and issues within the school and the wider community when considering the safety and wellbeing of pupils. These risks may include:

- child sexual exploitation and sexual harassment;
- abuse within children's intimate relationships, including physical, sexual or emotional abuse and stalking;
- child criminal exploitation, including county lines and financial exploitation;

- serious youth violence, gang involvement and threats involving weapons;
- radicalisation; and
- online abuse, exploitation and harmful digital content.

The school will also identify and respond to risks that are specific to its local context, including particular locations, peer groups, times of day, transport routes and online environments. These risks will inform safeguarding practice, staff training, the curriculum and partnership work with parents, the police, children's social care and other relevant agencies.

13. Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of when it is their duty to contact the police[3] regarding a safeguarding incident. They are also aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, **must be treated as a child** (referred to as a "juvenile") in the absence of clear evidence that they are older.

PACE[4] also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding Lead (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the Designated Safeguarding Lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned[5] before being questioned about an offence or asked further questions if the answers they give provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A police officer **must not** caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.

2. a social worker of a local authority

3. failing these, some other responsible adult aged 18 or over who is not:
   a. a police officer;
   b. employed by the police;
   c. under the direction or control of the chief officer of a police force; or
   d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

[3] When to Call the Police - when-to-call-the-police--guidance-for-schools-and-colleges.pdf
[4] Further information can be found in the Statutory guidance - PACE Code C 2019.
[5] A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

14. Filtering and Monitoring

Filtering and monitoring systems are essential to safeguarding children at school. We will take all reasonable steps to minimise pupils' exposure to harmful and inappropriate content through the Academy's IT systems and internet-connected devices.

The school uses the following filtering and monitoring systems:

- Smoothwall

Clear roles and responsibilities are assigned for the management and oversight of filtering and monitoring. The responsible member of the Senior Leadership Team is supported by the DSL and the Academy's IT staff or provider.

The school's eSafety/Online Safety Lead is: Sian Warde and Mark Hart.

- The effectiveness of the school's filtering and monitoring arrangements will be reviewed at least once every academic year. Checks will cover all relevant internet-connected devices and locations, and a record of the review, findings and any actions taken will be retained.

- The school will ensure that its systems block access to harmful and inappropriate content, including content associated with abuse, exploitation, violence, extremism, pornography, self-harm and AI-generated sexual imagery, while avoiding unreasonable restrictions on teaching and learning.

- Monitoring arrangements will reflect the school's safeguarding risks and enable concerns to be identified and acted upon promptly. Staff will understand their responsibilities for reporting concerns, and any safeguarding information identified through monitoring will be referred to the DSL and managed in accordance with this policy.

15. Child Protection Procedures

15.1 Children and Young People who may be particularly vulnerable

Some children may be at greater risk of abuse, neglect or exploitation, or may face additional barriers to recognising or reporting harm. Factors may include prejudice and discrimination, isolation, dependency on adults, communication difficulties and assumptions that indicators of abuse relate to a child's disability or additional needs.

To ensure that all pupils receive appropriate protection and support, we will give particular consideration to children who:

- are disabled, have special educational needs or certain medical conditions;
- are young carers;
- are pregnant or are parents themselves;
- are affected by parental substance misuse, domestic abuse, parental mental health needs or parental offending;
- are asylum seekers or refugees;
- are living away from home, in temporary accommodation or experiencing homelessness;
- live transient lifestyles or in chaotic and unsupportive home circumstances;
- are looked after, previously looked after or have a social worker;
- are vulnerable to bullying, prejudice, discrimination or social isolation;
- have communication needs or do not have English as their first language;
- are dependent on adults for personal or intimate care;

- may have difficulty recognising that behaviour towards them is abusive;
- have experienced repeated removal from the classroom, multiple suspensions or a part-time timetable, or are at risk of permanent exclusion;
- display early signs of abusive, violent or harmful behaviour;
- are at risk of child sexual exploitation, child criminal exploitation, trafficking or modern slavery;
- are at risk of female genital mutilation, forced marriage, or other honour or faith-based abuse;
- are involved in the court system or have a family member in prison;
- are at risk of serious violence, gang involvement or county lines; or
- are at risk of being radicalised into terrorism.

This list provides examples and is not exhaustive. The school will consider each child's individual circumstances and ensure that safeguarding information and support is provided in accessible formats and, where appropriate, community languages.

15.2 Children who are questioning their gender and requests for support with social transition

The school will provide a respectful and supportive environment for children who are questioning their gender. Bullying, harassment, and discrimination will not be tolerated, and any related safeguarding or wellbeing concerns will be addressed promptly.

In line with Keeping Children Safe in Education 2026, the school will not initiate social transition. Individual members of staff must not independently make changes relating to social transition, including changes to names, pronouns, uniform, facilities, sport, or other arrangements.

Where a child or their parent or carer requests support involving social transition, the matter will be referred to the Executive Principal/Head of School and the DSL. The request will be considered through a careful, documented and case-by-case process.

Parents or carers will be involved as a matter of priority, and their views will be given proper consideration. In the rare circumstances where there is reason to believe that involving parents or carers may place the child at increased risk, the DSL will determine what safeguarding action is necessary before parents are contacted or any decision is made.

Decisions will take account of:

- the welfare and best interests of the child and other children;
- the child's age, development, wishes and individual circumstances;
- any wider mental health, medical, neurodevelopmental, or safeguarding needs;
- relevant clinical or other professional advice;
- the impact of agreeing or declining the request;
- the school's safeguarding responsibilities; and
- its duties under the Equality Act 2010 and Human Rights Act 1998.

Primary age requests will be approached with particular caution. Staff will not provide clinical advice or undertake functions that require clinical expertise.

The school will explain that support with social transition will not include access to toilets, changing rooms, showers or residential accommodation designated for the opposite biological sex, or participation in sport designated for the opposite sex where single-sex participation is necessary for safety.

The child's biological sex will be recorded accurately. Information will only be shared with staff who need it to safeguard and support the child and other pupils. Decisions and their rationale will be recorded and reviewed where circumstances change, including where a child wishes to reverse or amend an earlier arrangement.

15.3 Recognising abuse, neglect and exploitation

To ensure that pupils are protected from harm, staff must understand the behaviours and indicators associated with abuse, neglect and exploitation.

Abuse and neglect are forms of maltreatment. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may occur within or outside the home, within an institution or community, and online.

Abuse, neglect and exploitation are rarely isolated issues and may overlap. Children may be harmed by adults or by other children. Children may also cause harm to
parents, carers or other family members, sometimes referred to as child-to-parent or caregiver abuse.

Keeping Children Safe in Education 2026[6] identifies four categories of abuse: **physical abuse, emotional abuse, sexual abuse and neglect.** These are set out in Appendix 1, together with relevant indicators of harm.

16. Specific Safeguarding and Child Protection Issues

16.1 Children who display harmful sexual behaviour

Children who display harmful sexual behaviour may themselves have experienced abuse, neglect, trauma or exploitation. Safeguarding procedures will therefore consider the needs and welfare of **both** the child who has experienced harm and the child displaying the behaviour.

Harmful sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The child's age, developmental stage, understanding, vulnerability, any difference in age or power and the context of the behaviour will be considered.

Staff who are concerned about a pupil's sexual behaviour, including behaviour occurring online, must speak to the DSL without delay.

All incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response, whether apparently consensual or non-consensual. This includes photographs, videos, livestreams, digitally altered images and content generated using artificial intelligence, including deepfakes or "deep nudes". The Academy will follow current UKCIS guidance when responding to such incidents.

Part Five of Keeping Children Safe in Education 2026 provides detailed guidance on harmful sexual behaviour, sexual harassment and sexual violence.

16.2 Children absent from education

Knowing where children are during school hours is an important aspect of safeguarding. Repeated or prolonged absence from education may be an indicator of abuse, neglect or exploitation, including child criminal exploitation, child sexual exploitation, trafficking, modern slavery, serious violence, forced marriage or female genital mutilation.

The school will monitor attendance carefully and respond promptly to unexplained, repeated or prolonged absence. Particular consideration will also be given to children who:

- are repeatedly absent during parts of the school day;
- have experienced repeated classroom removal or multiple suspensions;
- are placed on a part-time timetable;
- are at risk of permanent exclusion; or
- fail to take up an allocated school place.

The school will:

- ensure that staff understand their responsibilities for responding to absence from education;
- maintain clear procedures for following up unexplained absence and escalating safeguarding concerns;
- make reasonable enquiries to establish a child's whereabouts and safety;
- work with parents, the local authority, children's social care, the police and other agencies where appropriate;
- notify the local authority where required under the relevant attendance and admission-register regulations; and
- follow the school's attendance and children-missing-education procedures when a pupil's whereabouts cannot be established.

When a pupil leaves the school, we will take reasonable steps to identify their destination, record the name of the receiving school and expected start date, and transfer safeguarding information securely in accordance with this policy.

Staff must remain alert to patterns of absence or changes in attendance that may indicate a wider safeguarding concern. Where the relevant threshold is met, concerns will be referred to children's social care or the police.

Parents and carers are expected to provide the school with at least two current emergency contact numbers and to notify the school promptly of any changes.

16.3 Child Abduction

Child abduction is a form of child abuse and may involve the unauthorised removal or retention of a child by a parent, family member, acquaintance or stranger. Schools and colleges should be aware that child abduction can affect children of any age and may occur alongside other safeguarding concerns, including domestic abuse, child criminal exploitation, child sexual exploitation, forced marriage, honour-based abuse and missing episodes from home or care.

The Child Abduction Act 1984 makes it an offence for a person connected with a child under the age of 16 to take or send that child out of the United Kingdom without the appropriate consent. It is also an offence for another person, without lawful authority or reasonable excuse, to take or detain a child under the age of 16. Child Abduction Act 1984, Child Abduction Act 1984

In line with Keeping Children Safe in Education 2026, child abduction is understood as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction may be committed by parents or other family members, by individuals known to the child, or by strangers. International parental child abduction in England and Wales March 2026

Indicators of risk may include:

- A child expressing fear of being taken away.
- Concerns regarding parental disputes over residence or contact arrangements.
- Threats by a parent or family member to remove a child from the area or country.
- Unexplained or prolonged absences from education.
- Missing episodes or concerns that a child is associating with significantly older individuals.
- Information suggesting grooming, exploitation or coercive relationships.

Responding to concerns

Where there are concerns that a child may be at risk of abduction, staff must immediately inform the Designated Safeguarding Lead (DSL) or deputy DSL. The DSL will consider the level of risk and take appropriate action, which may include:

- Contacting Warwickshire Children's Social Care
- Seeking advice from the Warwickshire Family Connect or relevant safeguarding partners.
- Contacting the police immediately where there is an imminent risk to a child.
- Working with other agencies to safeguard and promote the welfare of the child.

If a child is believed to have been abducted, or there is an immediate threat to their safety, staff must contact the police on 999 without delay and then inform the DSL.

The school will work collaboratively with children and families and partner agencies to safeguard children who may be at risk of child abduction and will follow local Warwickshire safeguarding procedures at all times.

Related safeguarding issues: Missing Children, Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Domestic Abuse, Forced Marriage, Honour-Based Abuse, Online Safety and Children Missing in Education.

16.4 Child-on-child sexual harassment, sexual violence and abuse

Children can abuse other children and that this can occur inside or outside the school, within intimate relationships and online. Child-on-child abuse is a safeguarding issue for both the child who has experienced harm **and** the child alleged to have caused harm.

The school promotes an inclusive, anti-discriminatory safeguarding culture and challenges racism, sexism, homophobia, transphobia, disability discrimination and other forms of prejudice under child-on-child abuse.

Where the school receives a report of child-on-child abuse, it will follow the principles set out in Part Five of *Keeping Children Safe in Education 2026* and the procedures contained within this policy.

Although girls are more likely to experience sexual harassment and sexual violence, any child can be a victim, and abuse may occur between children of any age or sex. All children who report abuse will be taken seriously, supported and kept safe, regardless of how long it has taken them to come forward.

We recognise that child-on-child abuse may be occurring even where no reports have been made. Children may not feel ready or able to describe their experiences, may not recognise the behaviour as harmful, or may communicate their concerns indirectly through their behaviour, presentation or relationships. Reports may also be made by friends, parents or other adults, or arise from something witnessed or overheard by a member of staff.

Staff must act immediately where they have concerns about a child's welfare and must not wait for a direct disclosure.

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children;
- physical abuse, including hitting, kicking, shaking, biting, hair pulling, serious physical assault and threats involving weapons;
- sexual harassment , sexual violence, including rape, assault by penetration and sexual assault;
- harmful sexual behaviour;
- misogynistic or misandrist abuse and harassment;
- causing another child to engage in sexual activity without consent;
- making or sharing nudes and semi-nudes, including digitally altered or AI-generated images, deepfakes and "deep nudes";
- upskirting; and
- initiation or hazing-type violence and rituals.

Sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The school will consider the child's

age, developmental stage, understanding, vulnerability, the nature and frequency of the behaviour, any difference in age or power and the wider context.
Staff must never dismiss abusive or harmful behaviour as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. Doing so can create an unsafe culture, normalise abuse and discourage children from reporting concerns.

Child-on-child abuse is preventable. The school will seek to identify concerning behaviour at an early stage and provide timely, evidence-based and appropriate support to reduce the risk of harm or escalation.

The school promotes an inclusive, anti-discriminatory safeguarding culture and challenges racism, sexism, homophobia, transphobia, disability discrimination and other forms of prejudice under child-on-child abuse.

Whole school approach

The school will maintain a whole- school approach to preventing and responding to child-on-child abuse by:

- providing an age-appropriate preventative curriculum covering healthy relationships, consent, respectful behaviour, online safety and how to seek help;
- ensuring that staff receive appropriate training to recognise, report and respond to concerns;
- providing children with clear, accessible and trusted routes for reporting concerns;
- challenging inappropriate, abusive, misogynistic and misandrist behaviour;
- completing prompt and proportionate risk assessments and safety and support plans;
- monitoring patterns, trends, locations and times where concerns are more likely to arise;
- sharing relevant safeguarding information and emerging local trends with safeguarding partners, where appropriate; and
- using incidents and pupil voice to review the curriculum, behaviour systems, staff training and the school’s physical and online environments.

Responding to concerns and reports

All concerns and reports must be shared with the DSL without delay and recorded in accordance with the school’s safeguarding procedures.

The DSL will determine what immediate action is required and whether advice should first be sought from children’s social care or the police. Staff should use only **limited and open questions necessary** to clarify what has been reported. They must not undertake an investigation or routinely seek written statements from the children involved where this may interfere with a statutory investigation.

The school will give immediate safeguarding consideration to:

- the immediate safety and welfare of the child who may have experienced harm, the child alleged to have displayed harmful behaviour and any other children involved and the wider pupil body;
- decide what limited and open questions are necessary to clarify the concern, taking care not to undertake an investigation or compromise any police or social care enquiries;
- not routinely seek written statements from both children. Any initial discussion will be limited to establishing the basic facts and determining what immediate safeguarding action is required.
- seek advice from children’s social care, the police or other relevant agencies where appropriate;
- complete or update a proportionate risk assessment and safety and support plan;
- consider the wishes and feelings of the children involved;
- ensure that appropriate support is provided to the child who has experienced harm **and** to the child alleged to have displayed the harmful behaviour. Children who display harmful behaviour may themselves have experienced abuse, neglect, exploitation or trauma and may require safeguarding intervention.
- record the concern, decisions, actions and outcomes on CPOMS.

The proportionate risk assessment and safety and support plan may include changes to supervision, timetables, movement around the site, seating, transport or other arrangements required to keep children safe.

Parents / carers will normally be informed and involved unless doing so may place a child or another person at increased risk, compromise an investigation or otherwise be contrary to the child's welfare. Appropriate support will be provided to the child who has experienced harm **and** to the child alleged to have displayed the harmful behaviour. Children who display harmful behaviour may themselves have experienced abuse, neglect, exploitation or trauma and may require safeguarding intervention.

Mediation, restorative work or direct contact between the children will not be used where it may place pressure on, blame or retraumatise a child. Any such work will only be considered following a careful assessment of risk, suitability and the wishes and welfare of the child who has experienced harm.

Where appropriate, consequences may be considered in accordance with the school's Behaviour Policy. Safeguarding support will not be withdrawn solely because disciplinary action is taken.

Safety and support arrangements will be reviewed for as long as safeguarding risks or support needs remain. The decision to close a safeguarding concern will be made professionally by the DSL, based on the available evidence, the level of risk and the effectiveness of the support in place. Closure will not depend on both children agreeing that the matter has been resolved.

Where a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who made the report, or any other child involved, requires support or may have experienced harm from another source. A referral to children's social care or another agency will be considered where appropriate.

Where there is clear evidence that a report was deliberately invented or malicious, the school may consider proportionate action under the Behaviour Policy. The fact that a report is not substantiated does not, by itself, mean that it was deliberately false or malicious.

Temporary separation of pupils for safeguarding purposes

In rare circumstances, it may be necessary to temporarily prevent a pupil from attending the Academy's premises in order to separate them from another pupil for safeguarding purposes. This may include circumstances where an allegation of serious harm has been made by one pupil against another.
This is not a suspension or permanent exclusion on disciplinary grounds and will not be used as an informal or precautionary exclusion. A decision will only be made where:

- there is an identified safeguarding risk;
- separating the pupils is essential to protect one or more children; and
- the separation cannot practicably be achieved through arrangements that allow the pupils to remain on the school premises.

The decision will be made on a case-by-case basis. The DSL or a Deputy DSL will take a lead role and will complete or update an appropriate risk and needs assessment. Advice will be sought from children's social care, the police, the Local Authority, the Trust or other relevant agencies where required.

The school will consider:

- the best interests, safety and welfare of all children involved;
- the wishes and feelings of the children, where appropriate;
- its duties under the Equality Act 2010 and Human Rights Act 1998;
- whether reasonable adjustments or alternative on-site arrangements could safely manage the risk;
- the educational and support needs of the pupil who will not attend the premises; and

- how long the arrangement is necessary and how frequently it will be reviewed.

Parents or carers will be informed of the reason for the temporary separation. The Trust will also be notified without delay.

The arrangement will be kept under regular review and will remain in place only for as long as it is necessary and proportionate. Appropriate education, pastoral support and contact will be maintained throughout the period, and a clear reintegration and safety plan will be established before the pupil returns.

The guidance also states that, where the school or parent does not arrange education during this period, the local authority must arrange it under section 19 of the Education Act 1996. Reintegration arrangements should be planned and regularly reviewed with the pupil, parents and relevant professionals.

16.5 Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them, or for crimes they have witnessed. The families of children may also be subject to child arrangements processes through the family court system.

We recognise that both circumstances may be stressful for children and appropriate support will be provided in line with local and national guidance.

16.6 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.

Children may be drawn into exploitation through apparent friendship or affection, gifts, money, drugs, alcohol, accommodation or the promise of status or belonging. Exploitation may occur over time or as a one-off incident and may take place without the child's immediate knowledge, including through the creation or sharing of images online.

Children cannot consent to their own exploitation. A child may not recognise that they are being exploited, may believe they are in a genuine relationship, or may be criminalised for actions undertaken under coercion.

Exploitation may be committed or facilitated by an individual, organised network or gang. It may also involve trafficking or constitute modern slavery and may require consideration of a referral through the **National Referral Mechanism.**

We include the risks of child sexual exploitation within the PSHE and RSE curriculum.

All staff are made aware of the indicators of child sexual exploitation and must report any concerns immediately to the DSL.

16.7 Honour and faith-based abuse

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. Staff will receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

16.8 Female Genital Mutilation (FGM)

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

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

Teachers have a mandatory duty to personally report to the police cases where they discover that an act of FGM appears to have been carried out. This should be done with the support of the DSL so that wider concerns for the child or young person are also considered. This will also enable leaders to support the staff member through this process.

16.9 Radicalisation and Extremism

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the **'Prevent Duty'.**

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

Safeguarding information connected with a Channel or Prevent concern will be shared with the police and other appropriate partners.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral. **Any Prevent referral should also be accompanied by a referral to Family Connect.**

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

School staff receive training to help to identify signs of extremism.

Opportunities are provided through the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and leaders follow the DfE advice *Promoting fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools* (2014).

16.10 Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the school should notify the Local Authority of the circumstances.

16.11 Looked after (and previously looked after) children

The most common reason for children becoming looked after is as a result of abuse or neglect. Leaders ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about individual children's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.
School will work with the Virtual School Head's in supporting attendance and support their non-statutory role relating to children in kinship-care arrangements.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

The **designated teacher for looked after and previously looked after children** is **Sian Warde, Hannah McHale and Zoe Cleaver. Sian and Hannah are** is qualified teachers.

16.12 Work experience

We have detailed procedures to safeguard pupils undertaking work experience and will ensure that placement providers have appropriate policies and procedures in place to protect children from harm.

Where an adult provides teaching, training, instruction, care or supervision to a pupil frequently, for more than three days in any 30-day period, or overnight, this will be treated as **regulated activity,** even where the adult is supervised. **The placement provider must ensure that no person who is barred from working with children undertakes such activity.**

All checks and safeguarding arrangements will be considered in accordance with Part Three of Keeping Children Safe in Education 2026, including the specific checking restrictions that apply where pupils aged 16 or 17 undertake work experience.

16.13 Children staying with host families

Leaders may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during term time, and we will work with the Local Authority to check that such arrangements are safe and suitable. In such circumstances, we follow the guidance set out in Keeping Children Safe in Education (2026) to ensure that hosting arrangements are as safe as possible.

16.14 Children with family members in prison

Children who have family members that are sent to prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We recognise that these children may need support. Support will be provided in line with guidance from Barnardo's - [8]**Children with a parent or relative in prison.**

16.15 Criminal exploitation of children and County Lines

Child criminal exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.
CCE may be committed or facilitated by an individual, organised criminal network or gang. Children may be forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime or threatening or committing serious violence.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile telephone lines or another

[6] Children with a parent or relative in prison | Barnardo's
form of "deal line". This activity may take place locally or across the UK. Children and vulnerable adults may be exploited to move, store or sell drugs and money.

Gangs may establish a base within the home of a vulnerable person through force or coercion. This is commonly referred to as "cuckooing". Children may also be recruited and exploited online through social media and other digital platforms.

Children may become trapped through threats of violence, intimidation, manufactured drug debts or threats against their families. They may be coerced into carrying weapons or may begin carrying a weapon because they believe it will protect them from harm.

A child cannot consent to being exploited, abused or trafficked. Criminal exploitation may have occurred even where the activity appears voluntary, or the child identifies as belonging to the group involved. **Children who are criminally exploited must be recognised and treated as victims,** including where they have committed offences as a result of coercion.

CCE may involve trafficking and constitute modern slavery. Where a potential victim is identified, the school will follow its child protection procedures and consider a referral through the National Referral Mechanism, alongside any referral to children's social care or the police.

Staff will remain alert to indicators of CCE and county lines and must report any concerns immediately to the DSL.

16.16 Serious violence

Serious violence is a safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict, bullying, gang involvement or criminal exploitation.

Staff will remain alert to indicators that a child may be at risk of, or involved in, serious violence.

These may include:

- increased or unexplained absence from education;
- changes in friendships or relationships with older individuals or groups;
- a significant decline in educational performance;
- signs of assault, unexplained injuries or self-harm;
- significant changes in behaviour or wellbeing;
- unexplained gifts, money or new possessions;
- involvement in peer conflict, gangs or criminal networks; or
- carrying a weapon, threatening to use a weapon or expressing an intention to do so.

The risk of serious violence may be increased for children who have experienced disrupted education, including repeated suspensions, permanent exclusion or time in alternative provision, or who have a history of offending. Staff will also remain alert to periods when children may be at increased risk, including immediately before or after the school day.
Any concern that a child is carrying, using or threatening to use a weapon, or intends to do so, must be reported immediately to the DSL or a Deputy DSL.

The DSL will assess the risk to the child and others, taking account of all available safeguarding and contextual information.

Depending on the level of risk, the school will:

- put in place an appropriate safety and support plan;
- take action to de-escalate peer conflict;

- consider the safety of other pupils and staff;
- share relevant information with children's social care, the police and other agencies; and
- provide or seek early, evidence-based support, including access to trusted adults, mentoring, therapeutic support or other targeted interventions.

Where a child is in immediate danger, or a weapon is present, **staff will contact the police without delay.**

16.17 Domestic abuse

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse affecting young people can also occur within their relationships, as well as in the context of their home life.

Add details of your school's Operation Encompass arrangements, including who receives notifications, how they are recorded, and how proportionate support is offered without automatically questioning the child about the incident.

16.18 Homelessness

Being homeless, at risk of homelessness or living in temporary accommodation can present a significant risk to a child's welfare, attendance, wellbeing and educational outcomes.

In most cases, staff will consider homelessness in the context of children living with their families. However, some 16- and 17-year-olds may be living independently, including following exclusion from the family home, and may require a different level of assessment and support.

The DSL will support and signpost pupils and families to appropriate housing, welfare and local support services. Where homelessness or temporary accommodation gives rise to concerns that a child may be suffering, or is likely to suffer, harm, the school will make a referral to children's social care.

The school will respond appropriately to any temporary-accommodation notifications received from the local authority and will consider the impact on the child's safeguarding, attendance and support needs.

16.19 Children with a Social Worker

At school, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

The knowledge that a child has, or has previously had a social worker, will routinely inform decisions about attendance, pastoral provision, academic support and responses to absence.

Where appropriate the school will liaison with the Virtual School Head.

16.20 Young Carers

Young carers may experience additional pressures as a result of providing care or support to a family member. These responsibilities may affect their attendance, punctuality, attainment, behaviour, emotional wellbeing and ability to participate fully in academy life.
The school will seek to identify young carers at an early stage and will ensure that staff remain alert to indicators that a child may have caring responsibilities.

Where a young carer is identified, the school will:

- consider appropriate pastoral support and reasonable adjustments;
- work with the child and their family to understand their needs;
- monitor the impact of caring responsibilities on attendance, progress and wellbeing; and
- make referrals to relevant local young carer services or other agencies where additional support is required.

16.21 Children and online harm

When children use the school's network to access the internet, they are protected through appropriate filtering and monitoring systems. However, pupils may also access online content through personal devices, mobile data and applications that are not controlled by the school.

Online and offline safeguarding risks are often connected. These may include **harmful content or contact, child-on-child abuse, exploitation, cybercrime, misogynistic or harmful online influences, generative artificial intelligence, deepfakes and the creation or sharing of AI-generated sexual imagery.**

Where pupils use school devices or systems, appropriate supervision will be provided, and the effectiveness of filtering and monitoring arrangements will be reviewed regularly.

All staff who interact with children, including online, must remain alert to signs that a child may be at risk. Concerns must be reported to the DSL and managed in accordance with this policy, including referral to children's social care or the police where appropriate.

16.22 Online safety away from the school

Online teaching and communication with pupils will follow the same safeguarding principles and professional standards that apply to face-to-face contact. Staff must comply with the MAT Staff Code of Conduct, Online Safety Policy and any approved remote-learning procedures.

School will ensure that online learning tools and systems are approved, secure and used in accordance with data protection and privacy requirements.

Staff will:

- use only platforms and accounts approved by the school;
- maintain appropriate professional boundaries and language;
- ensure that online sessions are conducted in a suitable and professional manner;
- follow school procedures for one-to-one communication and online lessons;
- record relevant details of sessions where required; and
- report any safeguarding concern arising during online contact without delay.

Detailed arrangements for remote teaching, the use of webcams, recording sessions and one-to-one contact are set out in the school's **Online Safety, Remote Learning and Staff Code of Conduct policies.**

All staff who interact with children online must continue to look out for signs that a child may be at risk. Any concern will be managed in accordance with this child protection policy and referred to children's social care or the police where appropriate.

16.23 Mobile phones and generative artificial intelligence

The school will operate as a mobile phone-free environment by default. Pupils will not have access to mobile phones during lessons, movement between lessons, breaktimes or lunchtimes. Any exception must be authorised and documented in accordance with the school's Mobile Phone Policy, for example where access is required because of a medical need, disability or other exceptional circumstance.

Safeguarding concerns involving mobile phones, personal devices, mobile data, messaging applications, image sharing, online harassment or access to harmful content will be reported to the DSL and managed under this policy.

Only **generative artificial intelligence** systems approved by the school may be used for school purposes. Their use will be subject to appropriate safeguarding, data-protection, confidentiality, ethical and intellectual-property controls.

Staff and pupils must not enter confidential or identifiable information about a child into a generative AI system unless its use has been expressly authorised and the school is satisfied that appropriate data-protection safeguards are in place. **Harmful interactions with generative AI applications, AI-generated explicit imagery, deepfakes, manipulation, bullying or any other AI-related safeguarding concern must be reported to the DSL without delay.**

16.24 Children with medical conditions

Pupils at school with medical conditions should be properly supported so that they have full access to education, including school trips and physical education.

Governing bodies must ensure that arrangements are in place in schools to support pupils at school with medical conditions.
Governing bodies should also ensure that school leaders consult health and social care professionals, pupils and parents to ensure that the needs of children with medical conditions are properly understood and effectively supported.

DSLs must ensure that appropriate measures are in place to comply with the published version of Proposal on support for pupils with medical conditions at school government response (due to come into force in September 2026) which requires all schools to have a dedicated allergy policy and creates a statutory requirement for each school to provide training for teachers about allergies and use of Adrenaline Auto-Injectors (EpiPens). This also links to its reference in the Staff Behaviour (Code of Conduct) Policy.

A concern relating to the management of a child's medical condition will not automatically be treated as a safeguarding concern. However, staff must report the matter to the Designated Safeguarding Lead where the circumstances may indicate abuse, neglect, or exploitation.

This may include, for example, where a child is repeatedly sent to the school without essential medication or medical equipment, where necessary treatment or appointments are persistently withheld, or where there are concerns that symptoms are being fabricated or deliberately induced.

The DSL will consider the child's individual circumstances, seek appropriate advice, and determine whether support, a referral to children's social care or other safeguarding action is required.

17. Taking Action

Any child, in any family in any school, could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

Key points for staff to remember for taking action are:

in an emergency take the action necessary to help the child, if necessary, call 999; [3]

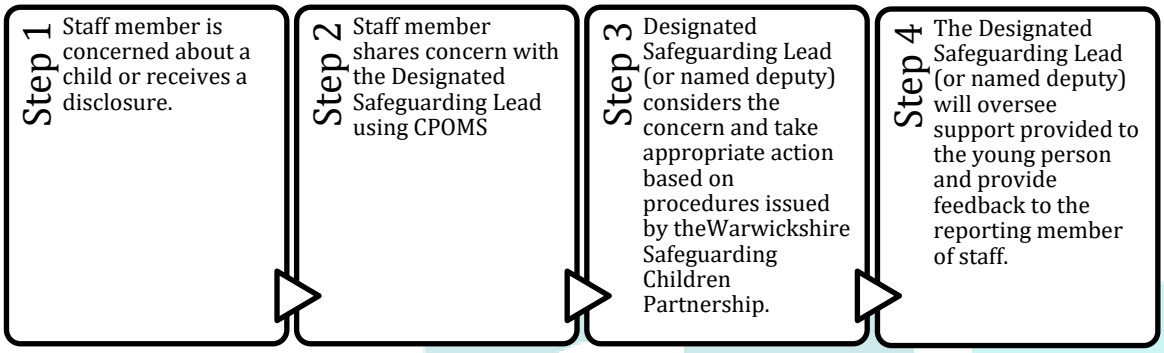
- report your concern as soon as possible to the DSL, definitely by the end of the day;
- do not start your investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern in writing (to the DSL) via CPOMS;
- seek support for yourself if you are distressed.

Any verbal conversations around safeguarding should be recorded in writing and shared with the DSL.

Staff should be familiar with ***'What to do if you're worried a child is being abused'*** as it contains excellent examples of the different types of safeguarding issues.

Whilst a full flowchart for responding to concerns or disclosures can be found in Appendix 2. This step-by-step process should be used as a quick reference guide.

[3] When to Call the Police - when-to-call-the-police--guidance-for-schools-and-colleges.pdf



If the DSL is not available, staff should speak to a member of the Senior Leadership Team and/or take advice from local children's social care. [9]

Staff can always seek advice and guidance from the Director of Safeguarding, if they are unable to contact the Designated Safeguarding Lead, a Deputy, or a member of the Senior Leadership Team.

[3] When to Call the Police - when-to-call-the-police--guidance-for-schools-and-colleges.pdf

[6] Department for Education, *Keeping Children Safe in Education* 2026, Part One, paragraph 59, page 21

17.1 If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should alert the DSL to their concern.

CPOMS is the single point for the delivery of concerns. Once staff record a concern on CPOMS, it will automatically alert the Designated Safeguarding Lead that a concern form has been raised.

17.2 If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that to help them they must pass the information on to the DSL. The point at which they tell the pupil this is a matter for professional judgement. During conversations with the pupils', staff will:

- allow them to speak freely;
- remain calm and not over-react;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You're doing the right thing by talking to me';
- do not be afraid of silences;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it;
- at an appropriate time tell the pupil that to help them, the member of staff must pass the information on and explain to whom and why
- not automatically offer any physical touch as comfort;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next;
- **report verbally to the DSL** even if the child has promised to do it themself;
- complete the record of concern form on CPOMS and submit it for the attention of the DSL as soon as possible;
- seek support if the staff member feels distressed.

17.3 Notifying parents/carers

Staff will normally seek to discuss any concerns about a pupil with their parents/carers. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Whilst parents will normally be involved in support planning where safe and appropriate, advice will be sought from external partners before contact where this may increase risk, compromise an enquiry or place another person at risk.

17.4 Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made unless to do so would increase the risk to the child.

In the above circumstance, contact should be made with the MASH on 01926 414144 and/or the police (in an emergency on 999 or on 101) Emergency Out of Hours Social Work Service Tel. 01926 886922.

Professionals who are uncertain whether concerns meet the threshold for a Child and Family Assessment or further safeguarding intervention can seek consultation and advice from the Local Authority, including the allocated Social Worker where a child is already open to Children's Services, or via the relevant Locality Children's Team.
In Warwickshire, Early Support Officers are assigned to support educational settings rather than being allocated to individual children. ESO's provide consultation, advice and challenge through clinics and professional discussions to support settings in considering risk, thresholds, and potential escalation for children receiving Early Support, or where parental consent has been obtained to discuss an individual child's circumstances.

Where a referral to Children's Services is required, this should be submitted through **Family Connect** in line with Warwickshire safeguarding procedures.
Parental consent should be sought where appropriate; however, where seeking consent or informing a parent/carer about a referral may place a child at increased risk of harm, or impact the child's safety, a referral can and should be made without consent in line with safeguarding thresholds and statutory safeguarding guidance.

Any member of staff may make a direct referral **to children's social care** if they genuinely believe independent action is necessary to protect a child. Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the Executive Principal/Head of School and the school Safeguarding Team are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason, they make a judgement that direct referral is in the best interests of the child.

17.5 Escalating concerns

Staff need to be aware of those times when concerns may look as though they are not progressing to an outcome or some form of action. This may be indicated by:

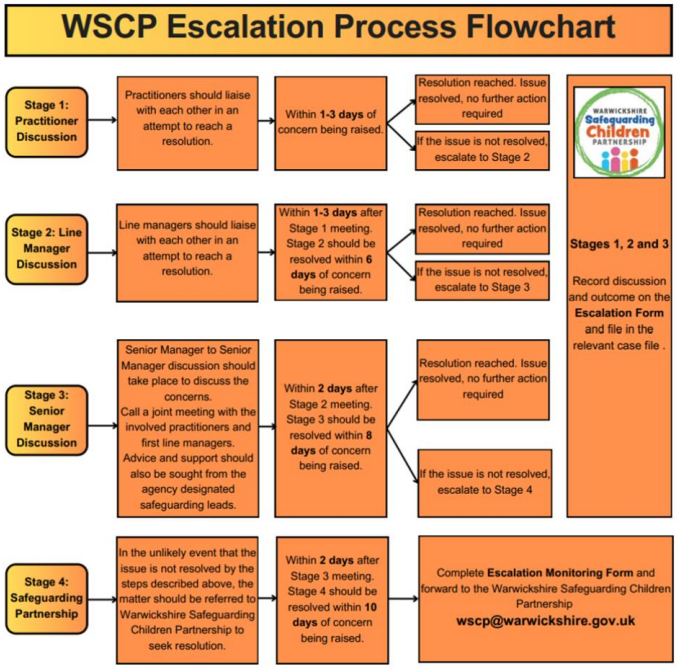
- difficulty in reaching a DSL;
- staff not being satisfied with the decision of the DSL or Executive Principal/Head of School;
- staff aware that a colleague has not passed on a concern;
- external agencies not accepting a referral from the school when it is felt one is needed;

- staff not aware of what has happened to their concern because of a lack of feedback.

Staff must not close down a concern because they feel "stuck" or "they can't do any more". It is important to escalate concerns to DSLs, Executive Principal/Head of School, other senior staff or if necessary, to the Chair of Governors/Chief Executive. If there are concerns about the work of an external agency staff, they will follow the escalation steps outlined in the [7] WSCP Practitioner Escalation Policy.

The important principle is not to allow a concern to be "closed down" without it having received the necessary attention, assessment and resolution.

[7] WSCP Practitioner Escalation Policy -



18. Confidentiality and sharing information

All staff will understand that child protection information requires a high level of confidentiality. This protects the privacy of the child and others involved and helps to ensure that the inappropriate disclosure of information does not compromise safeguarding action or an investigation.

Staff should ordinarily share safeguarding concerns with the DSL or a Deputy DSL, who will determine what information needs to be shared and with whom. Information will be shared only with those who need it to safeguard and promote the welfare of the child.

However, any member of staff may contact children's social care, the police or another appropriate agency directly where they believe this is necessary to protect a child. **Staff must not assume** that a colleague or another professional has already shared information or taken action.

Child protection information will be stored, processed and shared in accordance with data protection laws, including:

- the Data Protection Act 2018;

- the UK General Data Protection Regulation; and
- the Data (Use and Access) Act 2025.

Information sharing will be:

- lawful, necessary and proportionate;
- relevant to the current safeguarding risk;
- limited to what the recipient genuinely needs to know;
- adequate and clearly presented within its proper context;
- accurate and up to date;
- shared in a timely manner; and
- transferred and stored securely.

Data protection laws do not prevent the sharing of information for the purpose of keeping children safe. **Concerns about data protection or confidentiality must not be allowed to prevent appropriate safeguarding action**.

Where appropriate and safe, the DSL will explain to the child and/or parents or carers what information will be shared and may seek their consent. Consent is not always required before sharing safeguarding information.

Information may be shared without consent where there is a lawful basis to do so, including where:

- it is not possible or reasonable to obtain consent;
- seeking consent may place a child or another person at increased risk;
- seeking consent may compromise an investigation; or
- sharing the information is necessary to safeguard or promote the welfare of a child.

All information-sharing decisions will be recorded, including:

- what information was shared or withheld;
- with whom it was shared;
- the reason for the decision;
- the lawful basis relied upon, where relevant; and
- the outcome or action agreed.

This includes **recording the rationale where a referral to another agency was considered but not made**.

Child protection records will be held securely within CPOMS and separately from the main pupil file. Access will be restricted to those who require the information to fulfil their safeguarding responsibilities.

Requests from pupils, parents or carers to access child protection records will be referred to the Executive Principal/Head of School and considered in accordance with the Trust's Safeguarding, data protection and information-governance policies. Information may be withheld where a relevant legal exemption applies, including where disclosure may cause serious harm to the child or another person.

Where a pupil transfers to another school or college, safeguarding records will be transferred securely and separately from the main pupil file. **Relevant information may also be shared in advance** where this is necessary **to enable the receiving setting to assess risk** and put appropriate safety and support arrangements in place.

19. Universal and community-based Early Support and Family Help

Providing help and support as soon as problems emerge is an important part of safeguarding children and promoting their welfare.

Universal services and community based Early Support provides support at an early stage, before statutory intervention is required. Support may be delivered through education, health services, family hubs, youth services, housing services and voluntary or community organisations.

The DSL and Deputy DSL(s) will understand the local Early Support arrangements, threshold document and referral pathways and will ensure that staff know how to identify children and families who may benefit from additional support.

Early Support is a voluntary arrangement and the school's safeguarding team will seek consent from the parents/ carers to work with the child, the parents/carers and/or family members and relevant agencies to:

- identify the child's needs and any emerging safeguarding concerns;
- consider the child's wishes and feelings;
- agree the support required and the outcomes to be achieved;
- coordinate services through an identified lead practitioner where appropriate; and regularly review whether the support is improving the child's circumstances.

In Warwickshire, support for children and families should be provided at the earliest opportunity, building on strengths and protective factors whilst responding proportionately to identified needs, vulnerabilities, and risks. Through a relational and child-centred approach, practitioners work alongside children, young people, and families to provide the right support at the right time, with interventions reviewed and adapted as circumstances, needs and risks change.

Consistent with Warwickshire's safeguarding principles, practitioners are encouraged to work collaboratively with children, families and partner agencies to build on strengths, understand the child's lived experience, and respond proportionately.
This is achieved through completion of a **Pathway to Change Plan**, which identifies needs, desired outcomes and the actions required to improve the child's lived experience and promote positive change. For many children and families, needs can be met through **Universal Services and Early Support.**

However, where concerns are more complex or require a coordinated multi-agency response, needs and progress may be reviewed through a relational discussion, with support stepped up to **Targeted Early Support** where appropriate. Targeted Early Support is coordinated through local partnership arrangements to provide a structured response to emerging needs, reduce vulnerability and prevent concerns from escalating.

Early Support and Targeted Early Support are voluntary and consent-based approaches, requiring the participation and engagement of parents/carers and, where appropriate, the child or young person. A **Lead Practitioner** will ordinarily co-ordinate the assessment, Pathway to Change Plan and review process and may, where local arrangements permit, continue to support the family if a higher level of intervention subsequently becomes necessary.

A lack of parental engagement or consent to engage should not automatically result in a referral to Children's Services. However, professionals should consider whether non-engagement is resulting in unmet need, impacting clear risk analysis, limiting the effectiveness of support, or preventing concerns from being appropriately responded to.

The Designated Safeguarding Lead (DSL) or appropriate professional should continually consider whether a child's needs are escalating, whether interventions are achieving the intended outcomes, and whether safeguarding concerns indicate a need for statutory intervention.

As children's circumstances, risks and protective factors can be dynamic and change over time, Early Support, Targeted Early Support and Family Help arrangements should be subject to regular review. Decisions should be informed by the child's lived experience, family circumstances, professional curiosity, analysis of risk, and effective multi-agency information sharing. Ongoing review enables professionals to identify emerging concerns, reassess thresholds, and ensure children receive the right support at the right time.

Where concerns persist, increase, or indicate that a child may require a service from Children's Social Care, consideration should be given to making a referral to Family Connect.

Where there is reasonable cause to believe that a child is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services, or that their health or development is likely to be significantly impacted without such services, a referral should be made for consideration under Section 17 (Child in Need) of the Children Act 1989.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the child's safety must take priority over gaining consent. In these circumstances, professionals should not delay making a referral in order to obtain consent, where doing so may place the child at increased risk of harm or impact a safeguarding enquiry.

An immediate referral should be made via **Family Connect** for consideration under Section 47 of the Children Act 1989. Decisions to maintain, step up or step down support should be evidence-informed, proportionate, and responsive to the child's changing circumstances, ensuring that interventions remain focused on safeguarding, promoting welfare and improving outcomes for children and
young people.

The school will also understand and follow the local criteria and procedures relating to:

- section 20 of the Children Act 1989, concerning the local authority's duty to accommodate a child;
- section 31 of the Children Act 1989, concerning care and supervision orders;
- disabled children;
- children managed within the youth secure estate; and
- children affected by abuse, neglect, exploitation, trafficking, or modern slavery

The school will support children's social care and other agencies with assessments and multi-agency plans. All concerns, discussions, decisions, and the reasons for those decisions will be clearly recorded.

20. Whistleblowing

If the options above have been explored fully and the concern still isn't being handled effectively and is therefore placing the child or young person at risk, you must continue to **escalate your concerns** by contacting the privacy@tlet.org.uk inbox or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

21. Children's Mental Health (and Self Harm)

All staff will be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Mental health difficulties may also develop into a safeguarding concern, including where a child is experiencing self-harm, an eating disorder, suicidal ideation, or a risk of suicide.

Only appropriately trained professionals should diagnose mental health conditions. However, staff are well placed to observe children day to day and identify changes in behaviour, presentation or emotional wellbeing that may indicate a child requires additional support.

Possible indicators may include:

- significant changes in behaviour, mood or educational engagement;
- becoming withdrawn, fearful, aggressive, or unusually distressed;
- changes in friendships, sleep, eating or personal care;
- a loss of interest in activities previously enjoyed;
- signs of self-harm, self-neglect, or disordered eating; or
- statements or behaviour indicating suicidal thoughts or intent.

Children who have experienced abuse, neglect, exploitation, or other traumatic experiences may experience a lasting impact on their mental health, behaviour, attendance, relationships, and educational outcomes.

Where a member of staff has a mental health concern about a child that is also a safeguarding concern, they must take immediate action by recording the concern on CPOMS and speaking to the DSL or a Deputy DSL.

Where a child is in **immediate danger** or there is an immediate risk of serious harm, staff will contact the emergency services by **calling 999** or arrange urgent attendance at an Accident and Emergency Department (A&E). Urgent mental health support that is not an emergency may be sought through NHS 111 and the mental health option, alongside local crisis services.

The school will work with the child, their parents, or carers where appropriate, the Senior Mental Health Lead, Mental Health Support Team and other relevant professionals and agencies. Support and interventions provided by the school will be safe, evidence-based, appropriate to the child's age, developmental stage, and level of need, and kept under regular review.

Staff will have regard to relevant government guidance, including Mental Health and Behaviour in Schools, and will collaborate with local partners to identify children who may benefit from additional support and ensure that appropriate help is put in place. Warwickshire schools, settings and academies have access to the document [8] Guidance for Managing Self-Harm in Warwickshire Schools to assist with the identification and support for suicide / suicide ideation in children and young people.

[8] Guidance_for_Managing_Self_Harm_in_Warwickshire_Schools_-_October_2023_2.pdf

Appendix 1 – Four categories of abuse

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as **Fabricated or Induced Illness).**

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse [6]

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

6 *Keeping Children Safe in Education 2026, Abuse, Neglect and Exploitation section (Sexual Abuse).*

Neglect [9]

[10] Working Together to Safeguard Children 2026 defines neglect as:
"The persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development.."

Neglect may also 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
- provide suitable education.

Neglect may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is often characterised by the persistent and cumulative impact of unmet need over time, rather than by a singular incident.

Cumulative harm can occur when a child experiences a pattern of adverse experiences, missed opportunities for care, or harmful events which may be historical, current, or ongoing. These risks are often multiple, interrelated and can compound one another during critical developmental periods, affecting the child's physical health, emotional wellbeing, development, education, relationships, sense of safety and future life opportunities.

Practitioners should be mindful that neglect can present in different forms, including physical, emotional, educational, supervisory, and medical neglect, and can affect babies, children and adolescents across all backgrounds and communities.

Safeguarding reviews highlight that neglect is common, complex and can be missed, particularly where concerns are chronic, low-level, linked to poverty or parental challenges, or where the impact builds gradually over time. It is therefore important that professionals remain alert to the lived experience of the child and consider the cumulative impact of concerns, rather than viewing incidents in isolation.

Working Together 2026 recognises the importance of access to a suitable education as both a basic right and a protective factor. The failure to secure suitable education, persistent absence, children missing education, or barriers to accessing appropriate educational provision may indicate wider safeguarding concerns, unmet need, abuse, or neglect.

Indicators of abuse [11]

Physical signs define some types of abuse, for example, bruising, bleeding or broken

9 WSCP Website Neglect, WSCP-Neglect-Initial-Screening-Tool-v0.2_7.5.26.docx

10 Working together to safeguard children 2026

11 Understanding the signs and indicators -Centre of Expertise on Child Sexual Abuse

bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.

For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort

- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the Academy for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

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

Appendix 2 – Concerns Flowchart

Sharing/Recording Concerns
An individual with concerns about a pupil shares these concerns with the Designated Safeguarding Lead (DSL) or Deputy DSL.

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Consideration

The Designated Safeguarding Lead (or named deputy) considers the concern and takes appropriate action based on procedures issued by Warwickshire Safeguarding Children Partnership.

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Decision

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No Referral to Children's Social Care

The DSL considers school support, universal or community-based Early Support or Family Help, records the decision and keeps the child's progress under review. The matter must be reconsidered or escalated if risk increases or the situation does not improve.

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If the pupil's situation does not appear to be improving the referrer should press for re-consideration/escalation.

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Referral to Children's Social Care (Family Connect)

The DSL or Deputy DSL or other named, and qualified person should make a referral to Children's Social Care.

URGENT and Serious Concerns

If a situation is URGENT and SERIOUS and the DSL/Deputy DSL cannot be contacted, immediately contact a member of the SLT to ensure the relevant agency is contacted without delay