

# HURST GREEN PRIMARY SCHOOL



## Safeguarding & Child Protection Policy

Policy for the attention of			
Audience	Key Audience	Optional Audience	Additional/Notes
Senior Leadership Team	√		
Teachers	√		
Teaching Assistants	√		
Administrative Staff	√		
Lunchtime Supervisors	√		
Site Manager	√		
Cleaners	√		
Governors	√		
Parents	√		
Website	√		
Local Authority	√		

Responsibility of	Full governors
Review frequency	Reviewed annually or in response to changes in legislation or LSCB operating procedures
Previous versions agreed	19 March 2018; 3 December 2018; 3 December 2019; 22 March 2021; 29 November 2021; 27 November 2023, 19 February 2024; 21 October 2024
This version agreed	26 January 2026
Next review date	Autumn term 2026

## Contact Information

Role/Agency	Name	Telephone	E-mail
Headteacher	Kellie Wilson	01384 818210	<a href="mailto:kwilson@hurst-green.dudley.sch.uk">kwilson@hurst-green.dudley.sch.uk</a>
Designated Safeguarding leads	Natalie Webb/Kellie Wilson	01384 818210	<a href="mailto:nwebb@hurst-green.dudley.sch.uk">nwebb@hurst-green.dudley.sch.uk</a> <a href="mailto:kwilson@hurst-green.dudley.sch.uk">kwilson@hurst-green.dudley.sch.uk</a>
Deputy designated Safeguarding Leads	Andrew Lander Adam South	01384 818210	<a href="mailto:alander@hurst-green.dudley.sch.uk">alander@hurst-green.dudley.sch.uk</a> <a href="mailto:asouth@hurst-green.dudley.sch.uk">asouth@hurst-green.dudley.sch.uk</a>
Local authority designated officer (LADO)	Yvonne Nelson-Brown Sukhchandan Kaur		<a href="mailto:Allegations@dudley.gov.uk">Allegations@dudley.gov.uk</a> <a href="mailto:Yvonne.Nelson-Brown@dudley.gov.uk">Yvonne.Nelson-Brown@dudley.gov.uk</a> <a href="mailto:Sukhchandan.Kaur@dudley.gov.uk">Sukhchandan.Kaur@dudley.gov.uk</a>
Chair of Governors	Gill Withers	01384 818210	<a href="mailto:info@hurst-green.dudley.sch.uk">info@hurst-green.dudley.sch.uk</a>
Vice Chair of Governors	<b>Gary Marshall</b>	01384 818210	<a href="mailto:info@hurst-green.dudley.sch.uk">info@hurst-green.dudley.sch.uk</a>
Safeguarding Governor	<b>Grace Smyth</b>	01384 818210	<a href="mailto:info@hurst-green.dudley.sch.uk">info@hurst-green.dudley.sch.uk</a>
Looked after Children Lead	Natalie Webb	01384 818210	<a href="mailto:nwebb@hurstgreen.dudley.sch.uk">nwebb@hurstgreen.dudley.sch.uk</a>
E-Safety lead	Adam South	01384 818210	<a href="mailto:asouth@hurst-green.dudley.sch.uk">asouth@hurst-green.dudley.sch.uk</a>
Dudley Multi-Agency Safeguarding Hub	MASH Team	0300 555 0050	<a href="mailto:childrensMASH@dudley.gcsx.gov.uk">childrensMASH@dudley.gcsx.gov.uk</a>
Emergency Duty Team (Out of hours)	Social Care	0300 555 8574	
Safeguarding Lead for Education	Jane Dickens	01384 816822	<a href="mailto:Jane.Dickens@dudley.gov.uk">Jane.Dickens@dudley.gov.uk</a>
Designated Officer/ (DO), for allegations against staff	Yvonne Nelson-Brown Valerie Wilmott	01384 813110 01384 813164	<a href="mailto:allegations@dudley.gcsx">allegations@dudley.gcsx</a>
Privately Foster named person (school) Privately Foster named person (Dudley LA)	Natalie Webb Angela Marsh	01384 818210	<a href="mailto:nwebb@hurst-green.dudley.sch.uk">nwebb@hurst-green.dudley.sch.uk</a>

Prevent referrals	Liaise with Dudley's Community Safety Partnership (safe & sound)		<a href="http://www.dudleysafeandsound.org/prevent">www.dudleysafeandsound.org/prevent</a>
FGM	Police	101	
Young Person and Early Help Officer-Police			<a href="mailto:a.peters@west-midlands.pnn.police.uk">a.peters@west-midlands.pnn.police.uk</a> <a href="mailto:k.russell@west-midlands.pnn.police.uk">k.russell@west-midlands.pnn.police.uk</a> Mobile tel- 07391864242 External Tel: 101 option3 West Midlands Police Extension 851 308
Dudley Virtual School Head	Emma Thomas	01384 813493	<a href="mailto:Emma.Thomas@dudley.gov.uk">Emma.Thomas@dudley.gov.uk</a>
School Mental Health Lead	Kathryn Karadia	01384 818210	<a href="mailto:Kkaradia@hurst-green.dudley.sch.uk">Kkaradia@hurst-green.dudley.sch.uk</a>
Dudley Child Sexual Exploitation Team	n/a	01384 817777	<a href="mailto:CSE.Team@dudley.gov.uk">CSE.Team@dudley.gov.uk</a>
School Nurse	Shropshire Community Health NHS Trust	07824560221	<a href="mailto:gemma.glover6@nhs.net">gemma.glover6@nhs.net</a>
CAMHS		01384 324689	

## Contents Page

<b>1. Hurst Green Purpose and Aims</b>
<b>2. Statutory Framework</b>
<b>3. The Designated Safeguarding Lead (DSL)</b>
<b>4. The Headteacher and Governing Body</b>
<b>5. Safeguarding Policies and Procedures/Legal Responsibilities and Duty to Share Information</b>
<b>6. Roles and Responsibilities</b>
<b>7. Confidentiality</b>
<b>8. Communication with parents/carers</b>
<b>9. Whole Staff Responsibilities and Procedures- Reporting Concerns</b>
<b>10. Record keeping</b>
<b>11. Dudley's Threshold and Early Help</b>
<b>12. When to be concerned: Signs and Symptoms of Abuse</b>
<b>13. Specific Safeguarding issues</b>
a) Child on child abuse
b) Sharing of nudes and semi-nudes ('sexting')
c) Honour Based Abuse (including FGM and Forced Marriage)
d) Child Criminal Exploitation (CCE)
e) Child Sexual Exploitation (CSE)
f) Child Absent from Education
g) Missing Pupils
h) Homelessness
i) Domestic Abuse
j) Child on Child Sexual Violence and Sexual Harassment
k) Radicalisation and Extremism
l) Mental Health
m) Contextual Safeguarding
n) Areas with Particular Risk
<b>14. LGBT + Pupils</b>
<b>15. Online Safety – Filtering and monitoring</b>
<b>16. Named Designated Person for Children in Care (CiC)</b>
<b>17. Virtual School Head</b>
<b>18. Children with SEND and Disabilities</b>
<b>19. Safer Recruitment</b>
<b>20. Procedure for Dealing with Allegations about Staff</b>

<b>21. Whistleblowing</b>
<b>22. Safeguarding in the Curriculum</b>
<b>23. Specific Safeguarding Issues</b>
<b>24. Implementation, review and monitoring</b>

## 1. Purpose and Aims

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

**Hurst Green Primary aims to ensure that:**

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

**We give special consideration to children who:**

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are Children in Care or previously Children in Care

## 2. Statutory Framework

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), the Maintained Schools Governance Guide and, where applicable, the Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy is also based on the following legislation:

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

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities for safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines regulated activity in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015
- Information Sharing: Advice for Practitioners Providing Safeguarding Services (2018)
- The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

This policy also meets the safeguarding and welfare requirements set out in the statutory framework for the Early Years Foundation Stage (EYFS)

### **.3. The Designated Safeguarding Lead (DSL) for Hurst Green Primary School are:**

Kellie Wilson and Natalie Webb

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL is contactable out of school hours and during the holidays by email:

[safeguarding@hurst-green.dudley.sch.uk](mailto:safeguarding@hurst-green.dudley.sch.uk)

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

### **The Deputy Designated Safeguarding leads for Hurst Green Primary School are:**

Andrew Lander (Assistant Head)

Adam South (Assistant Head)

Kathryn Karadia (SENDCo)

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

- Work closely with teachers and share information & provide advice and support to other staff on child welfare and safeguarding and child protection matters
- **Ensure all staff receive appropriate safeguarding training and regular updates, including annual KCSIE awareness, and that training reflects local risks and emerging safeguarding themes.**

- Sets out procedures so that staff promptly share their safeguarding concerns in writing
- **Promote a strong safeguarding culture, ensuring staff feel confident to raise concerns, challenge decisions where necessary and escalate concerns when they believe a child remains at risk.**
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- **Ensure all safeguarding concerns are recorded accurately, securely and in a timely manner, including maintaining clear chronologies and ensuring safeguarding records are transferred securely when pupils move school, in line with data protection requirements.**
- **Ensure safeguarding responses are child-centred, taking account of the wishes and feelings of children and ensuring they know how to report concerns and who they can talk to.**
- Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.
- Refer cases where a crime may have been committed to the Police
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children, particularly in relation to Early Help
- Work closely with Mental Health Leads
- **Support the headteacher in the oversight of low-level concerns about staff, ensuring they are recorded, reviewed and monitored to identify patterns of behaviour, in line with Part Four of KCSIE.**
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Panel, Disclosure and Barring Service and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- **Have oversight of children missing education, persistent absence and unexplained absence, ensuring these are recognised as potential safeguarding concerns and escalated appropriately.**
- Have a good understanding and takes the lead of the filtering and monitoring systems and processes in place at our school, this is included in the DSL's job description
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- **Act as a point of contact for concerns and allegations about staff, ensuring these are referred to the Local Authority Designated Officer (LADO) promptly and managed in line with Part Four of KCSIE. The full responsibilities of the DSL and [deputy/deputies] are set out in their job description.**
- **Support the review of safeguarding policies and procedures at least annually, and whenever there are changes to statutory guidance or local safeguarding arrangements.**

#### 4. The Headteacher, Governing Body, Trustees, Proprietors

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

- **Promoting a strong safeguarding culture**, ensuring all staff feel confident to raise concerns, challenge decisions where necessary and escalate safeguarding issues when they believe a child remains at risk.
- **Ensuring that safeguarding concerns are recorded accurately, securely and in a timely manner**, and that information is shared appropriately and lawfully in line with data protection legislation and local safeguarding procedures.
- Ensuring that staff (including temporary & supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- **Ensuring safer recruitment practices are followed**, including appropriate pre-employment checks, in line with Part Three of KCSIE.
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly, including online **safety** and cyber security
- **Acting as the case manager for concerns and allegations against staff or volunteers**, ensuring these are referred to the Local Authority Designated Officer (LADO) promptly and managed in line with Part Four of KCSIE.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- **Ensuring safeguarding policies and procedures are reviewed at least annually** and updated in response to changes in statutory guidance or local safeguarding arrangements.
- **Ensuring appropriate systems are in place to identify and respond to children missing education, persistent absence and unexplained absence**, recognising these as potential safeguarding concerns.
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting
- Promoting good oral health and signposting accordingly to services

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

The Governing Body/Trust will appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full governing board. **This role is always separate from the DSL.**

**The nominated Governor for Child Protection and Safeguarding for Hurst Green Primary is: **Grace Smyth****

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

All Governors have read and understood **Keeping Children Safe in Education 2025**. (Part Two of this policy has information on how governors are supported to fulfil their role.)

The Governing Body/trust will be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

All Governors have read and understood **Keeping Children Safe in Education 2025**.

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

- **Promote and support a strong safeguarding culture**, providing appropriate challenge to senior leaders to ensure safeguarding is effective and prioritised across the school.
- **Ensure safeguarding policies and procedures are reviewed at least annually** and updated promptly in response to changes in statutory guidance or local safeguarding arrangements.
- **All staff undergo safeguarding and child protection training**, including online safety, and that such training is regularly updated and in line with advice from the safeguarding partners.
- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- **Safeguarding concerns are recorded accurately, securely and in a timely manner**, and that information is shared appropriately and lawfully in line with data protection legislation.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- **Systems are in place to identify and respond to children missing education, persistent absence and unexplained absence**, recognising these as safeguarding risks.
- **Safer recruitment practices are followed**, including appropriate pre-appointment checks, in line with Part Three of KCSIE.

Other areas of assurance include:

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

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

### **Local multi-agency safeguarding arrangements.**

- The school's policy has been written taken into consideration our locally agreed multi-agency procedures

The links for Dudley's procedures are below:

<https://dudleysafeguarding.org.uk/>

## 5. Safeguarding Policies and Procedures/Legal Responsibilities and duty to share information

### 5.1 Our safeguarding responsibilities include:

#### Safeguarding and promoting the welfare of children:

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

Safeguarding incidents and behaviours can be associated with factors outside the school and/or home, and staff should consider the **contextual safeguarding** factors that may be influencing a child's behaviour or risk of harm.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

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

**Children** includes everyone under the age of 18.

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

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

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

➤ • The local authority

- • The Integrated Care Board (ICB) for an area within the local authority
- The chief officer of police for a police area in the local authority area

### 5.2 Our Duty to share information includes:

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Staff are required to share information with the Designated Safeguarding Lead, and where appropriate with other agencies, in line with statutory guidance, local safeguarding arrangements and data protection legislation. Information will be shared lawfully, proportionately and in a timely manner.

## 6. Roles and Responsibilities

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

### All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually **and whenever it is updated.**
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils to speak out and share their concerns
- **Report any safeguarding concerns about children immediately to the Designated Safeguarding Lead (DSL) or a deputy DSL**, and record concerns in line with school procedures.

All staff will be aware of:

- **Our systems that support safeguarding**, including this child protection and safeguarding policy; the staff code of conduct; the role and identity of the designated safeguarding lead (DSL) and deputies; the behaviour policy; the online safety policy; and **the safeguarding risks associated with children missing education, persistent absence and unexplained absence**, including their role in reporting concerns..
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- **The school's whistleblowing procedures**, and how to raise concerns about safeguarding practices or the conduct of adults working with children.

- **The process for reporting low-level concerns about staff**, including concerns that do not meet the harm threshold, in line with Part Four of KCSIE.
- **What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected**, including specific issues such as FGM, and how to **share information appropriately and lawfully**, while maintaining an appropriate level of confidentiality.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Section 13 of this policy outlines in more detail how staff are supported to do this.

#### ➤ **Staff safeguarding training.**

All staff members will undertake safeguarding and child protection training, online safety training including IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures **including how and when to use them**, to ensure they understand the school's safeguarding systems **to ensure they understand the school's safeguarding systems and their responsibilities as set out in Part One and Annex B of Keeping Children Safe in Education** and can identify signs of possible abuse, neglect and exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

In addition:

- All staff will undertake annual Cyber-security training.
- **Teachers will have regard to the Teachers' Standards**, which set clear expectations that teachers:
  - **Manage behaviour effectively to ensure a good and safe environment**
  - **Have a clear understanding of the needs of all pupils**
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- **All staff will receive training in recognising and reporting low-level concerns about staff**, including concerns that do not meet the harm threshold, in line with Part Four of KCSIE.
- Staff will also receive regular safeguarding and child protection updates including online safety, as required but at least annually. Regular updates throughout the academic year could include (for example, through emails, e-bulletins and staff meetings).
- **Training will include awareness of contextual safeguarding**, recognising that children can be at risk of harm outside the home, including online and within peer groups and the wider community.

- All new staff will receive robust safeguarding training in line with the whole school training package, this will be delivered as part of their induction process before they commence working with our pupils/students.
- The school will maintain accurate records of safeguarding training undertaken by staff
- Safeguarding training will be proportionate to staff roles and responsibilities.

## The DSL and deputies

The DSL and deputy DSLs will undertake child protection and safeguarding training at least every two years, which will be updated in line with statutory guidance.

In addition, they will update their knowledge and skills regularly and at least annually (for example, through e-bulletins, safeguarding briefings, meeting with other DSLs, or time taken to read and digest safeguarding developments).

This training will include inter-agency working, Early Help, information sharing, children missing education, peer-on-peer abuse, online safety (including filtering and monitoring), and local safeguarding arrangements.

The DSL and deputies will also undertake Prevent Awareness training.

## Volunteers and Contractors

All volunteers and contractors will receive safeguarding information and procedures on arrival at the school, appropriate to their role. This will include how to report a safeguarding concern to the Designated Safeguarding Lead (DSL) or a deputy, behavioural expectations in line with the school's code of conduct, and guidance on online safety, filtering and monitoring, and the appropriate use of mobile technology.

Volunteers and contractors will be appropriately supervised and will receive safeguarding information and updates as required during their time working with the school to ensure that they understand and comply with safeguarding expectations. Appropriate safeguarding checks, including DBS checks where required, will be completed before volunteers or contractors work with children. This applies to regular and one-off volunteers and contractors.

## Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This will ensure that all governors have the knowledge and information needed to perform their **strategic role**, understand their **safeguarding** responsibilities, provide **effective** challenge, and **seek assurance that safeguarding policies and procedures are effective**, supporting a robust whole-school approach to safeguarding.

All Governors will undertake training relating to online filtering and monitoring **to enable them to understand the systems in place and provide appropriate oversight and challenge**. In addition one Governor will be trained in Cyber-security.

As the chair of governors may be required to act as the 'case manager' if an allegation of abuse is made against the headteacher, **they will receive appropriate training in managing allegations in line with Part Four of Keeping Children Safe in Education**.

All governors are familiar with and understand the expectations set out in Keeping Children Safe in Education 2025 and Governor training reflects local safeguarding arrangements and emerging risks.

## Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## 7. Confidentiality

**The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. This includes allowing practitioners to share information without consent.**

Information will be shared lawfully, proportionately, securely and in a timely manner, in line with statutory guidance and local safeguarding arrangements.

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

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

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

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

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

It is the responsibility of all staff to share information about the protection of children with the Designated Safeguarding Lead (DSL) **and, where appropriate, other relevant professionals and agencies.**

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

Every effort will be made to ensure that confidentiality is maintained **where this does not conflict with the need to safeguard and promote the welfare of children.** Information will be handled and disseminated on a need to know, professional basis only.

## 8. Communication with parents/carers

Where appropriate **and in the best interests of the child**, we will discuss any concerns about a child with the child's parents **or carers**. The DSL will normally do this in the event of a suspicion or disclosure. **Decisions about communication with parents will be child-centred, taking account of the wishes and feelings of the child and their safety.**

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

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

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

care to make sure our approach to information sharing is consistent. **Information shared with parents will be limited to what is appropriate and necessary, and confidentiality will be maintained where possible.**

The DSL will, **where appropriate and in consultation with** relevant agencies (this will be decided on a case-by-case basis):

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

## 9. Whole Staff Responsibilities- Reporting Concerns

We have a child centred approach to safeguarding. It is the responsibility of **ALL** staff, volunteers and governors to inform the Designated Safeguarding Lead (**DSL**) or a **deputy DSL** of any concerns without delay and record this in writing using the Online CPOMS system. Children include everyone under the age of 18. **Concerns must be shared lawfully, proportionately and in a timely manner, in line with statutory guidance and local safeguarding arrangements.**

**Everyone** who is exposed to children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals will make sure their approach is child centred. This means that they will consider, at all times, what is **in the best** interests of the child.

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

**Concerns about the conduct of adults working with children, including low-level concerns that do not meet the harm threshold, must be reported in line with the school's low-level concerns policy.**

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

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

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

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Listen **carefully and take notes as soon as possible.**
- Check you have understood correctly what the child is trying to tell you.
- It is inappropriate to make any comments about the alleged offender.
- Communicate that **they have** a right to be safe and protected

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words using the online CPOMS system. Stick to the facts, and do not put your own judgement on it. If relevant, a body map is available on CPOMS to record location of any visible marks. At no time should **any member of staff** consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.
- It is very important to record the child's exact wording and not your interpretation of what they said, the time, date and a body injury map if relevant. All concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing. If you require any support with the recording of the concern, please consult a DSL. This can include a telephone conversation if a DSL is not available in person.
- Maintain confidentiality on a need to know basis only

**The child's wishes:** At Hurst Green Primary we complete either the "Three houses" or the "Colour Monsters" worry concerns with children at an appropriate level for their age and maturity. This helps to gain a picture of what life is like for the child and helps to inform our next steps for the child.

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

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by through the Dudley Children's Portal Site <https://childrensocialcare.dudley.gov.uk/web/portal/pages/home>

In addition you can contact Dudley Front Door (formally MASH) on 0300 555 0050.

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

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

If you disagree with a professional's decision and wish to challenge refer to Dudley's resolution and Escalation Protocol **to ensure concerns are appropriately challenged in the best interests of the child.**

### **Referral**

If it is appropriate to refer the case to Local Authority Children's Social Care or the Police **because a child is suffering, or is likely to suffer, significant harm**, the DSL will make the referral or support **staff** to do so, **as appropriate**. If a **member of staff** makes a referral directly, **they must inform** the DSL as soon as possible.

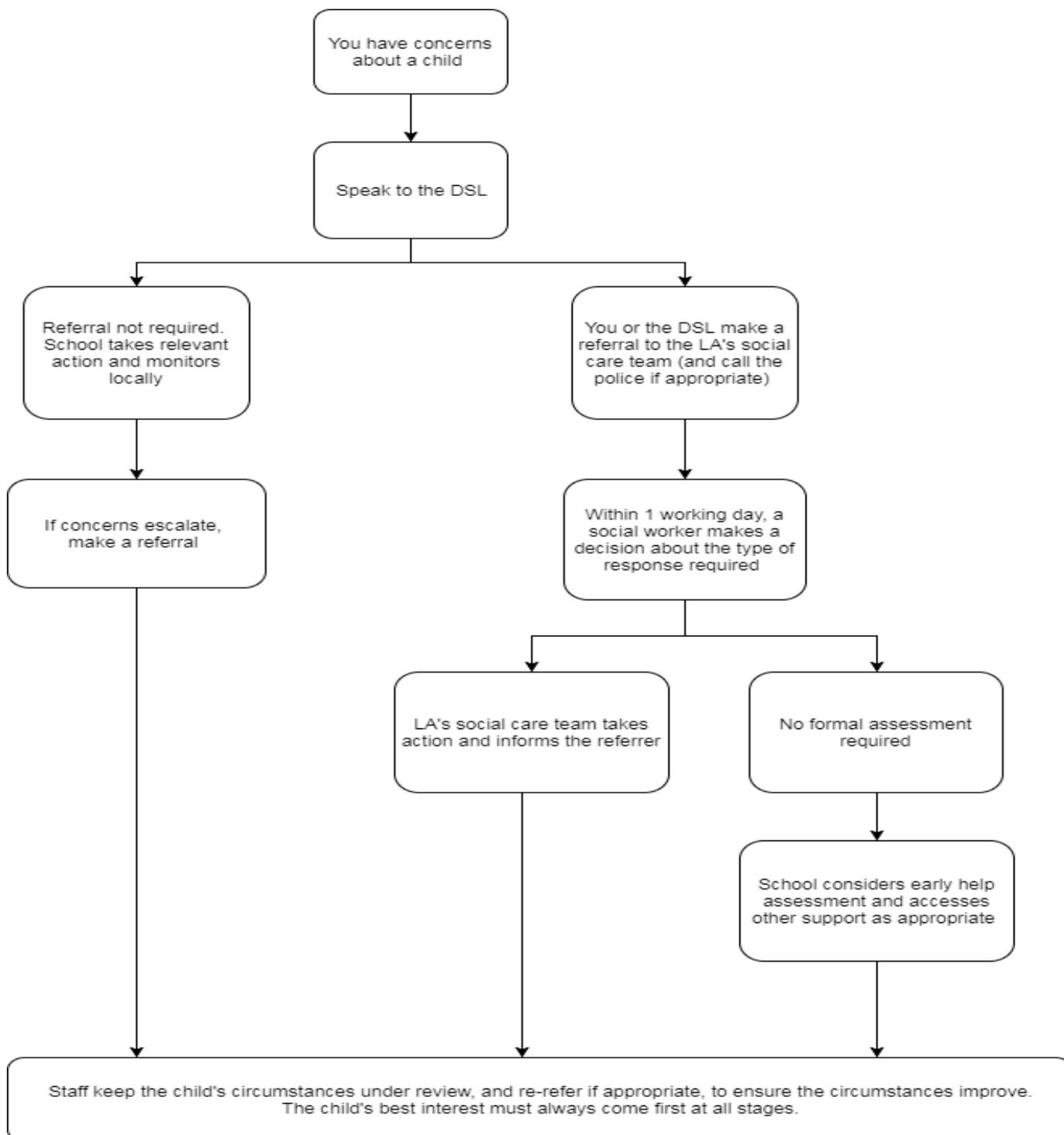
The Local Authority will decide within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

**All referrals, decisions, actions taken and outcomes will be recorded clearly and securely, in line with the school's safeguarding record-keeping procedures.**

**Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action.)



## 10. Record keeping

- We will hold records in line with our records retention schedule.
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, **must be recorded promptly and accurately in writing**. If there is any doubt about whether to record something, staff should discuss this with the DSL.
- Safeguarding records will include **clear, accurate chronologies** to help identify patterns, escalation and ongoing risk.
- Non-confidential **safeguarding information required for staff to carry out their role will be accessible where appropriate**. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained **in line with statutory guidance and the school's records retention schedule** after they have left the school.
- Decisions about **information sharing**, including when information is shared without consent, will be clearly recorded, including the rationale for those decisions.
- When a child moves to another school, the DSL will ensure safeguarding and child protection files are transferred **promptly, securely and separately** from the main pupil file. Where concerns are significant or complex, the DSL will speak directly with the receiving school's DSL.
- Information will be stored securely online (CPOMS) and any paperwork will be stored in a **locked** cupboard away from other pupil files. The records will have restricted access to designated people and be maintained in line with data protection **legislation**.

## 11. Dudley's Thresholds and Early Help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up **multi-agency assessment (such as an Early Help Assessment)** as appropriate. Staff may be required to support other professionals in an early help assessment, in some cases acting as the lead practitioner.

Our local family centre is: **Halesowen Family Centre** (01384 813954)

The DSL will keep **cases** under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving, **if the child's needs escalate, or if the child's needs meet statutory criteria, such as those for a Child in Need (Section 17) or Child Protection (Section 47) assessment**. Timelines of interventions will be monitored and reviewed.

**Dudley Safeguarding People Partnership's Continuum of Help and Support describes the levels of need:**

### **Level 1** – Universal Support (no referral required)

**Families with universal needs will be supported through universal services**. Professionals and parents can contact Dudley's Family information Service on 01384 814398 to obtain information about support available for children, young people and families.

### **Level 2** – Early Help/Family Support

**Practitioners should initiate proportionate support where emerging needs are identified. An Early Help Assessment can be completed and shared with the relevant Family Hub/centre.**

### **Level 3** – Targeted Early Help.

Children and families with more complex needs that require coordinated multi-agency support should be assessed using an Early Help Assessment and shared with the appropriate Family Hub.

### **Level 4** – Complex or Statutory Need

Concerns that meet statutory thresholds should be referred to **Dudley Children's Front Door** via the **Request for Help and Support Form** on the Dudley Children's Portal. The local authority will determine the appropriate response and timescale in line with statutory guidance.

If, after a referral, outcomes are not shared, or if there is continued concern, the DSL or referrer must follow up with the local authority and, where appropriate, follow the local **Resolution and Escalation Protocol** to ensure concerns are addressed.

## **12. When to be concerned**

All staff, **volunteers and governors**, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial **harm can** take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) **sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse)**, criminal exploitation, serious youth violence, county lines, and radicalisation. **These risks will be considered within a contextual safeguarding approach, recognising that harm can occur outside the home and may be influenced by peer groups, online spaces and the wider community.**

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

## **Signs and Symptoms of Abuse**

Staff should be aware that indicators of abuse and neglect may not always be obvious and may change over time. Concerns do not need to be proven and should be reported to the DSL or a deputy in line with this policy.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. **Abuse and neglect can also include sexual exploitation, criminal exploitation and modern slavery, which may occur alongside other forms of abuse.**

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

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

### **Emotional abuse may involve:**

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

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

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening.

**The activities may involve:**

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

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

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

**Once a child is born, neglect may involve a parent or carer failing to:**

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

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

### 13. Specific Safeguarding Issues

All staff will have an awareness of safeguarding issues and will be aware that behaviours linked to drug taking, alcohol abuse, truancy and **sharing of nudes and semi-nudes (sometimes referred to as sexting or youth-produced sexual imagery)** put children in danger. **These issues will be considered within a contextual safeguarding approach, recognising that harm can occur outside the home and be influenced by peer groups, online spaces and the wider community.**

All staff will be aware **that** safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to bullying (including cyber bullying), gender based violence/sexual assaults and **sharing of nudes and semi-nudes (sometimes referred to as sexting or youth-produced sexual imagery)**. Staff will be clear as to the school's policy and procedures concerning child-on-child abuse. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) **and children who are (or are perceived to be) LGBT** are at a greater risk **of being targeted by others**.

Staff should be aware of the importance of:

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

- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “ just having a laugh”, or “boys being boys”; and
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **a) Child-on-Child abuse - Allegations of abuse made against other pupils**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously **online and offline**.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

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

**Information will be shared with parents, carers and external agencies lawfully, proportionately and on a need-to-know basis, in line with this policy and statutory guidance.**

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos **(including the sharing of nudes and semi-nudes)**

**The school will ensure that victims are supported, reassured and kept safe, and that their wishes and feelings are taken into account when determining next steps.**

#### **If a pupil makes an allegation of abuse against another pupil:**

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the Local Authority Children’s Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS) **or other appropriate mental health services**, if appropriate

#### **We will minimise the risk of child-on-child abuse by:**

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensuring pupils know they can talk to staff confidentially by educating them through **PSHE** lessons and assemblies
- Ensuring staff are trained to understand that a pupil harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

#### **Ensure staff are trained to understand:**

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead **safeguarding** role in **managing concerns, and will work with the headteacher and senior leaders regarding any disciplinary action.**
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

#### **b) Sharing of nudes and semi-nudes (sometimes referred to as sexting or youth-produced sexual imagery)**

##### **Staff responsibilities when responding to an incident**

If a **member of staff** is made aware of an incident involving sharing of nudes and semi-nudes, you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Responses will be **child-centred**, taking account of the wishes and feelings of the young people involved, their age, maturity and any additional vulnerabilities.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. The DSL will consider **contextual safeguarding factors**, including peer groups, online platforms and wider environmental risks. This meeting will consider the initial evidence and aim to determine:

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

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

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

**They may speak with the pupils involved, where appropriate, to establish the facts and assess risk, without investigating.**

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

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm. **Information will be shared lawfully, proportionately and on a need-to-know basis.**

### **Referring to the police**

If it is necessary to refer an incident to the police, **this will be done through the appropriate police reporting route, including 101 where appropriate.**

### **Recording incidents**

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

## **c) So-called 'honour-based' abuse (including FGM and forced marriage)**

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. **This is a statutory duty under the Serious Crime Act 2015.** Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out on a pupil aged **18 or under** must speak to the DSL and follow our local safeguarding procedures. **Reports should be made to the police via 101, or 999 where there is immediate danger.**

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

**These concerns will be considered within a contextual safeguarding approach, recognising that risk may arise from family, community, cultural or wider environmental factors.**

### **Indicators that FGM has already occurred include:**

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

**Potential signs that a pupil may be at risk of FGM include:**

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

**The above indicators and risk factors are not intended to be exhaustive.**

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

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

If a member of staff suspects that a child or young person is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place **Staff must not contact parents or family members in cases of suspected forced marriage, as this may place the pupil at increased risk of harm.** They will then report this to the DSL.

The DSL may:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and **refer the case to Local Authority Children's Social Care in line with local safeguarding procedures**
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

**Information will be shared lawfully, proportionately and on a need-to-know basis, in line with statutory guidance.**

## d) Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. **These concerns will be considered within a contextual safeguarding approach, recognising that risks may arise from peer groups, online activity, and the wider community.**

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be trafficked, forced to work in cannabis factories, modern slavery, coerced into moving drugs or money across the country (county lines), involved in gangs and knife crime, forced to shoplift or pickpocket, or to threaten other young people.

**Indicators of CCE can include a child:**

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. **Children who are criminally exploited will be treated as victims of abuse, not as perpetrators of criminal activity.**

## e) Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. **These risks will be considered within a contextual safeguarding approach, recognising that abuse may occur outside the home and be influenced by peer relationships and online environments.**

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share **nude or semi-nude images or videos**, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

If a member of staff **has concerns that a child may be at risk of CCE/CSE**, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. **Victims of CSE will be supported, reassured and kept safe, and their wishes and feelings will be taken into account when determining next steps.**

## **f) Children Absent from Education (also referred to as children missing education – CME)**

A child going absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help **reduce the risk of persistent or repeat absence in future**. This includes informing the local authority if a child leaves the school without a new school being

named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

**Risks associated with absence will be considered within a contextual safeguarding approach, recognising the influence of peer groups, online activity and wider community factors.**

For further information: Children Missing Education statutory guidance for local authorities (most recent version)

## **g) Missing pupils**

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

- **Secure the school site and alert all staff immediately.**
- **The DSL will be informed immediately and will oversee the safeguarding response.**
- Available staff will search immediate area and report back to designated adult
- **If the child cannot be located quickly and there is concern for their safety**, a phone call to be made to parents and police
- Following incident, it will be recorded on CPOMS and discussed by SLT to ensure anything that can be learnt will be acted upon for future reference. Depending on circumstances it may be necessary to write a risk assessment for the child.

If a child goes missing out of school hours we **will support parents and liaise with the police and other relevant agencies, as appropriate.**

## **h) Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. **Homelessness can be associated with other safeguarding risks, including neglect, abuse, exploitation, mental health difficulties and increased risk of going missing.**

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

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

## **i) Domestic Abuse**

Domestic abuse can take many forms, including psychological, physical, sexual, financial and emotional **abuse**. Our school recognises that exposure to domestic abuse can have a serious, long term emotional and psychological impact on children. We work with our key partners and share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

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

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. The Domestic Abuse Act 2021 introduces the first statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. West Midlands police forces are part of [Operation Encompass](#)

Where domestic abuse is identified as a safeguarding concern, the DSL will consider whether a referral to children's social care is required. The DSL will provide support according to the child's needs and update records about their circumstances.

Information will be shared lawfully, proportionately and on a need-to-know basis, in line with statutory guidance.

## j) Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. **The school will ensure that victims are supported, reassured and kept safe, and that their wishes and feelings are taken into account when determining next steps.**

### Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. **Any report of sexual violence or sexual harassment must be reported immediately to the DSL or a deputy, and must not be investigated by staff.**

Ultimately, the school will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required. **Where required, the DSL will ensure that appropriate risk assessments and support plans are put in place for all children involved.**

## k) Radicalisation and Extremism

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, **including** democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- **Sudden or unexplained changes in beliefs or behaviour, particularly where linked to extremist ideology**isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including **via social media platforms, messaging apps or online forums**
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

**Children identified as being at risk of radicalisation will be supported, reassured and safeguarded, and will not be treated as offenders.**

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

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

Dudley's LA Prevent Officer is [Mark.Wilson@dudley.gov.uk](mailto:Mark.Wilson@dudley.gov.uk)

## If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. For Prevent referrals **the DSL may liaise with Safe and Sound** (Dudley's Community Safety Partnership) website- <https://www.dudleysafeandsound.org/prevent>. **Concerns about radicalisation will be considered within a contextual safeguarding approach, recognising the influence of online spaces, peer groups and wider community factors.**

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

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

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

**Information will be shared lawfully, proportionately and on a need-to-know basis, in line with statutory guidance and local safeguarding arrangements.**

## I) Mental Health - If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The school's Mental Health Lead is Kathryn Karadia.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Positive mental health is the concern of the whole community and we recognize that schools play a key part in this. Our school wants to develop the emotional wellbeing and resilience of all pupils and staff, as well as provide specific **support for** those with additional needs.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action. **Where there is a risk of harm to the child or others, safeguarding procedures will take precedence.**

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. This could also include a conversation with parents **or carers** or a referral to the school nurse, **where appropriate.**

Staff can refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

**All concerns and actions taken will be recorded in line with the school's safeguarding record-keeping procedures.**

## m) Contextual Safeguarding

At Hurst Green Primary School, we know that safeguarding incidents and/or behaviours can be associated with factors outside our school and/or can occur between children outside our school. All staff, but especially the Designated Safeguarding Lead (or deputy) will consider the context which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children will consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so our school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. **This approach underpins the school's response to all safeguarding concerns.** Additional information regarding contextual safeguarding is available here:

<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

## n) Areas with particular risk

**At Hurst Green we have identified areas with particular risk:**

•**Physical intervention:** On occasions it may be necessary to physically intervene with a pupil likely to hurt or injure themselves or others. The details of this can be found in our Positive Handling Policy.

•**Personal/Intimate care:** To meet the needs for individual pupils, personal/intimate care may need to be provided by members of staff. The details for this can be found in our Personal Care Policy.

**Staff involved in these areas will receive appropriate training and follow agreed procedures to ensure pupils' dignity, safety and wellbeing.**

## 14. LGBT+ pupils

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

Several studies also evidence that pupils **who are or are perceived to be LGBT+** may be at increased risk of becoming victims of CSE.

Schools should therefore ensure that they are aware of the increased risk factors and know how to access appropriate support for these young people when required

**The school will ensure that LGBT+ pupils are supported, respected and kept safe, and that concerns are responded to promptly in line with this policy.**

## 15. Online Safety – **FILTERING AND MONITORING**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. **The Designated Safeguarding Lead (DSL) has lead responsibility for understanding and overseeing the school's filtering and monitoring systems and processes and for ensuring that concerns identified through these systems are responded to appropriately.**

To address this, our school aims to:

- **Train staff to ensure they understand the filtering and monitoring systems in place, their role in safeguarding, and how to report concerns identified through these systems.**

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- **The governing body will seek assurance that filtering and monitoring systems are effective and regularly reviewed.**

Monitoring systems are used for safeguarding purposes only and are proportionate, transparent and respect privacy, in line with data protection legislation. Any concerns identified through filtering or monitoring systems will be reviewed promptly and acted upon in line with the school's safeguarding procedures.

### The 4 key categories of risk

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

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Children in year 5 and 6 need to give their phones into the school office at the start of the day to **support safeguarding, learning and wellbeing.**

For more information on Online Safety please refer to the E-Safety Policy.

## 16. Named Designated Person for Children in Care (CiC)

The **Designated Teacher for Children in Care** will work in partnership with the Virtual School **Head (VSH)** on how funding can best support the progress of a CiC

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

- Appropriate staff have relevant information about Children in Care's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

**The DSL and Designated Teacher have access to details of children's social workers and relevant Virtual School Heads, where appropriate.**

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

The designated teacher has **undertaken statutory training and has the appropriate experience to fulfil the role**

### **As part of their role, the designated teacher will:**

- Work closely with the DSL to ensure that any safeguarding concerns regarding Children in Care and previous Children in Care are quickly and effectively responded to. **Safeguarding and promoting the welfare of Children in Care and previously looked-after children is a priority, and concerns will be acted upon immediately in line with this policy.**
- Work with virtual school heads to promote the educational achievement of Children in Care and previous Children in Care, including discussing how pupil premium plus funding can be best used to support CiC and meet the needs identified in their personal education plans

### **Children with a social worker**

Children may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. **The school will promote high aspirations and educational outcomes for children with a social worker.**

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. **Information about Children in Care and children with a social worker will be shared lawfully, proportionately and on a need-to-know basis.**

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

## **17. Named Virtual Head – Emma Thomas**

[emma.thomas@dudley.gov.uk](mailto:emma.thomas@dudley.gov.uk)

## **18. Children with Special Educational Needs and Disabilities (SEND)**

We recognise that pupils with special educational needs **and disabilities** (SEND) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being **disproportionately** impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. All staff at Hurst Green Primary School will ensure that these pupils in their care are identified and take additional care to keep them safe.

**Any safeguarding concerns relating to pupils with SEND will be reported to the DSL or a deputy in line with this policy and will not be dismissed or assumed to be related solely to a child's additional needs. Pupils with SEND will be supported, listened to and kept safe, and their views and experiences**

will be taken into account as far as possible. Safeguarding concerns relating to pupils with SEND will be considered within a **contextual safeguarding approach**, recognising the impact of peer relationships and wider environments.

## 19. Safer Recruitment procedure

**Hurst Green Primary School** has created a culture of safe recruitment, and has adopted the Local Authority policy on recruitment procedures. **Hurst Green Primary School** will follow the 'Safer Recruitment' processes for all appointments, which will include the following:

- declaration of our statement of commitment and the intent to undertake a DBS check in the advertisement;

### **Our statement of Commitment**

**Hurst Green Primary School** is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All posts are subject to Enhanced DBS Clearance, Qualification and ID Checks.

- ensuring that at least one member of the interview panel has attended **Safer recruitment training in line with the Dudley Safeguarding People Partnership (DSPP)**
- ensuring that references are obtained **prior to appointment**, and scrutinised carefully
- ensuring that a safeguarding question is included in the interview
- ensuring that any gaps in employment are explored at interview
- undertake a DBS check\* at the relevant level to the position
- ensuring that a prohibition check is carried out for anyone in 'teaching work', not just those with QTS
- maintaining a **Single Central Record (SCR)** in line with statutory requirements, which is regularly reviewed and monitored by senior leaders and governors.

(\*An enhanced DBS check with barred list information will be appropriate for all staff **where the role involves regulated activity with children.**)

The school will obtain written confirmation from agencies or third-party organisations that appropriate safeguarding and recruitment checks have been completed for supply staff and contractors.

If the school has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form of regulated activity.

All new appointments will have their identity verified from **using original photographic identification and proof of address** to obtain an enhanced DBS check with barred list information. The school will always ask for written information about previous employment history and check that the information is complete.

The school does not have the power to request DBS checks for visitors (for example children's relatives visiting a sports day). On these occasions, the Headteacher will use their professional judgment on how best to supervise these occasions. **Volunteers will be subject to appropriate safeguarding checks and supervision arrangements, determined by their role and level of contact with pupils.**

As part of 'Disqualification Under the Childcare Act 2006' (amended 2018), **staff working in relevant early years and childcare roles will be required to declare disqualification or disqualification by association, in line with statutory guidance, where applicable.**, may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school and evidence of this will be recorded.

All visitors in school will be required to verify their identity to the satisfaction of staff before being allowed entry into school.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors will need to leave their belongings, including their mobile phone(s), in a safe place during their visit **to support safeguarding and privacy**.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

## **20. Procedure for dealing with Allegations about Staff - Concerns about a staff member, supply teacher or volunteer**

**The Headteacher is responsible for managing allegations against staff. The DSL may be involved to provide safeguarding advice, but does not manage the allegation process.**

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the **headteacher**. If the concerns/allegations are about the headteacher, speak to the **chair of governors**.

Hurst Green Primary School will follow the 'The Managing Allegations against Staff or Volunteers' (DSPP Procedures) in conjunction with part four of Keeping Children Safe in Education **2025**. This includes new information added in relation to Managing Allegations criteria, so schools must work with other agencies to investigate when a member of staff has:

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

Hurst Green Primary School will ensure allegations against supply teachers are dealt with appropriately when they are not the employer. We will not simply cease to use this teacher. Processes are developed to manage this akin to the disciplinary procedure and the school should advise supply agencies of its process for managing allegations.

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

If any concerns or allegations made against a member of staff, supply teacher or volunteer are brought to the headteacher, in the first instance these will be discussed with **the Local Authority Designated Officer (LADO) in line with local safeguarding arrangements**. It is useful at this stage to also provide full names of the member of staff and child involved in the allegation, their dates of birth, addresses

and details of any previous concerns, as this will avoid delay. All allegations against people who work with children will be passed on to the Designated Officer (Managing Allegations) in accordance with the Working Together to Safeguard Children (**latest version**) and the DSPPB Safeguarding Children Procedures. A Managing Allegations Referral form will be needed to be completed. The parents or carers of the child will be contacted as soon as possible following advice from the Social Care team. Parents or carers will not be contacted until advice has been sought from the LADO and/or children's social care. **The school will liaise with the supply agency and ensure appropriate action is taken, rather than simply ending the placement.**

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

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

**Information will be shared on a need-to-know basis only. Absolute confidentiality cannot be guaranteed where this would place a child at risk.**

In addition to this, **Hurst Green Primary School** have routine systems for continually monitoring the performance of staff ensuring compliance with both child protection procedures and the code of good practice. All staff within **Hurst Green Primary School** will adhere to the **Guidance for Safer Working Practice for those working with Children and Young People in Educational Settings (2022)**. This covers a wide range of issues around staff conduct.

### **Referral to Disclosure and Barring Service (DBS)**

Any employee, who is dismissed or resigns due to a child protection case, will be referred to the DBS, who will consider the future risk and harm the individual possesses to vulnerable groups including children. **It is a legal duty and failure to refer when the criteria are met is a criminal offence.**

The Single Central Record is in place and includes **all statutory recruitment and vetting checks required under Keeping Children Safe in Education (2025)**. Further support is sought from HR

### **Actions if there are concerns**

Concerns about poor practice:

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

#### **Action if the concern does not meet the harm threshold**

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold- low level concerns) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. The term 'low level' concern does not mean that it is insignificant, it

means that the behaviour towards a child does not meet the threshold (see part four- Section one of KCSIE 2025). A low level concern is any concern- no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'- that an adult working in or on behalf of the school may have acted in a way that:

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

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

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

All allegations will be acted upon **without delay**, and advice from the LADO will be sought at the earliest opportunity.

## 21. Whistleblowing

Whistleblowing is a key safeguarding mechanism and is particularly important where concerns relate to the behaviour of adults working with children. All staff and volunteers will feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Where a staff member feels unable to raise an issue with the Headteacher or a member of the senior leadership team, or feels their concerns are not being addressed, other whistleblowing channels are open to them. Further guidance on whistleblowing is available on the government website, *Advice on whistleblowing*, and through Dudley Council's whistleblowing policy.

The NSPCC whistleblowing helpline is available for staff who have concerns about the way child protection issues are being handled: 0800 028 0285.

## 22. Safeguarding in the Curriculum

Child protection and wider child safety issues will be addressed through the curriculum as appropriate, particularly through Relationships and Health Education (RHE), computing, assemblies and wider pastoral provision. This includes teaching pupils about online safety, appropriate online behaviour, and how to report concerns about online content or contact. Children are taught to recognise when they are at risk and how to get help when they need it. Pupils are taught how to seek help, including how to identify trusted adults both in school and outside of school.

## 23. Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

The school recognises that expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

Staff are encouraged to access specialist advice and guidance where required, including from:

- the **Dudley Safeguarding People Partnership (DSPP)**
- **NSPCC**
- relevant government guidance published on GOV.UK

These sources provide information and procedures relating to (but not limited to): child sexual exploitation, child criminal exploitation, children missing education, online safety, domestic abuse, mental health, radicalisation, forced marriage, honour-based abuse (including FGM), neglect and fabricated or induced illness.

Links to current local and national safeguarding guidance are maintained separately to ensure staff always have access to the most up-to-date information.

## **24. Implementation, Review and Monitoring**

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

This policy will be reviewed at least annually and whenever there are changes to legislation, statutory guidance or local safeguarding arrangements.

The governing body will approve the policy at each review and hold the Headteacher to account for its effective implementation.

### **Supporting statutory guidance**

- *Keeping Children Safe in Education (2025)*
- *Working Together to Safeguard Children* (latest version)
- *Guidance for Safer Working Practice for those working with Children and Young People in Education Settings (2022)*

### **Data Protection**

This policy adheres to the principles under data protection law. For further information please review the school's data protection policy published on the school's website.