



# ST JOSEPH'S CATHOLIC PRIMARY SCHOOL

## Child Protection and Safeguarding Policy 2025/26

Version:	1
Date created/updated:	01.09.2025
Ratified by:	Local Governing Body
Date ratified:	September 2025
Date issued:	01.09.2025
Policy Review Date:	August 2026
Post Holder Responsible for Review:	Principal

## Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Mr A Wilkes	<a href="mailto:awilkes@emmausmac.com">awilkes@emmausmac.com</a>
Deputy DSL	Mrs Rachel Mitchell Mrs Michele Riley	<a href="mailto:rmitchell@emmausmac.com">rmitchell@emmausmac.com</a> <a href="mailto:mriley@emmausmac.com">mriley@emmausmac.com</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	Mr John F. Coyne	<a href="mailto:jcoyne@emmausmac.com">jcoyne@emmausmac.com</a>
Safeguarding Governor	Mr John F. Coyne	<a href="mailto:jcoyne@emmausmac.com">jcoyne@emmausmac.com</a>

## School Mission Statement

*In following the Gospel values of Jesus, we are called to love, to learn and to respect one another.*

## 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.

## The school aims to ensure that:

- ✓ Appropriate action is taken in a timely manner to safeguard and promote the welfare of all children.
- ✓ All staff are aware of their statutory responsibilities with respect to safeguarding and receive appropriate, timely training and support.
- ✓ Our safeguarding processes and practices are anti-discriminatory. We recognise the additional barriers that may prevent some students recognizing and disclosing abuse.
- ✓ We ensure that all children have the same protection, regardless of any barriers they may face.

We are aware that some students have additional vulnerabilities, including but not limited to:

- ✓ Students with Special Educational Needs and Disabilities (SEND)
- ✓ young carers
- ✓ race, ethnicity, religion, LGBTQ+, gender identification or sexuality
- ✓ Have English as an additional language (EAL)

- ✓ Are known to be living in difficult situations, i.e temporary accommodation or where there are issues such as substance abuse or domestic violence
- ✓ Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
- ✓ Are asylum seekers
- ✓ Are at risk due to either their own or a family member's mental health needs
- ✓ Are Children in Care or previously Children in Care
- ✓ Are missing or absent from education for prolonged periods and/or repeat occasions
- ✓ Whose parent/carer has expressed an intention to remove them from school to be home educated

## **Statutory Framework**

[Keeping children safe in education](#) (KCSIE 2025)

[Statutory Guidance - Working Together Guidance](#)

[Maintained Schools Governance Guide](#)

[Academy Trust Governance Guide](#).

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

## **Links to 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 1 person conducting an interview to be trained in safer recruitment techniques
- ✓ Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- ✓ [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- ✓ Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- ✓ [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- ✓ [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- ✓ Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- ✓ [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- ✓ [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- ✓ [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- ✓ [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- ✓ The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- ✓ This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

This policy also complies with our funding agreement and articles of association.

### **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/>

<https://dudleysafeguarding.org.uk/wp-content/uploads/2023/03/DSPP-Support-Level-Guidance-and-Framework-March-2023.pdf>

### **Definitions**

#### **Safeguarding (our duties and responsibilities)**

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

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. 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. Further definition of neglect are detailed in the policy.

**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 Designated Safeguarding Lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Anthony Wilkes, Interim Executive Principal. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

When the DSL is absent, the Deputy Designation Safeguarding Leads (DDSLs) will cover. They are Mrs Mitchell and Mrs Riley.

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

- ✓ Work closely with teachers and share information & provide advice and support to other staff on child welfare and safeguarding and child protection matters
- ✓ Sets out procedures so that staff promptly share their safeguarding concerns in writing
- ✓ Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- ✓ Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- ✓ Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.

- ✓ Refer cases to the police where a crime may have been committed.
- ✓ 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
- ✓ Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Panel, Disclosure and Barring Service and/or police), and support staff who make such referrals directly
- ✓ Have a good understanding of harmful sexual behaviour
- ✓ Have a good understanding and take the lead on the filtering and monitoring systems and processes in place at our school, this is included in the DSL's job description
- ✓ Know the local specialist support available to all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and how to access this
- ✓ Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- ✓ Keep the Principal informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

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

### **The Principal**

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

### **The Governing body,**

- ✓ Will approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.

- ✓ Will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- ✓ The Chair of governors (Mr John Coyne) will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).
- ✓ 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
- ✓ read and understood Keeping Children Safe in Education 2025.
- ✓ Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

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

- ✓ The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- ✓ Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- ✓ The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- ✓ 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 children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- ✓ Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
- ✓ Ensure 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
- ✓ Review the [DfE's filtering and monitoring standards](#), in liaison with IT staff and service providers and ascertain actions necessary to support the school in meeting these standards

Where an external provider is delivering services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- ✓ Seek assurance that the external provider has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- ✓ Ensure there are arrangements external provider to liaise with the school about safeguarding arrangements, where appropriate
- ✓ Ensure that safeguarding requirements are a condition of using the school premises, and that failure to comply would result in the termination of any such agreement.

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

### **7.1 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 Partners:

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

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

### 7.2 Our Roles and Responsibilities include:

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.

The school plays a crucial role in preventative education by embedding safeguarding and well-being in the school curriculum.

### 7.3 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
- ✓ Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- ✓ Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- ✓ Provide a safe space for pupils to speak out and share their concerns

All staff will be aware of:

Our systems 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, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education

- 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
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

## **8.0 Training**

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

### **8.1 The DSL and deputies**

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

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

### **8.2 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, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible

abuse, neglect and exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

In addition:

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

### **8.3 Volunteers and Contractors**

All volunteers and contractors will receive safeguarding procedures and guidance on their arrival at the school this will include how to report a concern, the behavioural expectations of the visitors to ensure that children are safe, also filtering and monitoring alongside appropriate use of mobile technology. Safeguarding information will be provided as required during their time working with the school to ensure that they are compliant.

Appropriate visitor checks will take place i.e. DBS checks, ID check, guest speaker protocol form completed, recognising visitors i.e. lanyard colours.

The organisation sending the professional, such as the Local Authority, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors will be accompanied by a member of staff at all times.

### **8.4 Governors**

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

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

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

## **9 Confidentiality**

**Please refer to the Emmaus Catholic MAC Data Protection Policy for further details on information sharing.**

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

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)

## **10. Communication with parents**

Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure.

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

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

In the case of allegations of abuse made against other children, we will usually notify the parents of all the children involved.

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)
- We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

## **11 Reporting systems for our pupils**

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

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

To achieve this, we will:

- ✓ Put systems in place for pupils to confidently report abuse
- ✓ Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- ✓ Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- ✓ Pupils are reminded that they can 'Reach Out' to DSLs and DDSLs in school
- ✓ We make pupils aware of reporting systems and processes throughout the school year such as posters, assemblies, PSHE and RSE lessons
- ✓ Pupils will be reassured following making a disclosure and receive ongoing support from DSLs and mental health leads in school

## **12 Whole Staff Responsibilities**

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

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

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

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

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

- ✓ Listen without prejudice.
- ✓ 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
- ✓ 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. Stick to the facts, and do not put your own judgement on it
- ✓ Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so

Aside from the above professionals, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

It is important to also understand the following:

- The child may not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

## 12.2 Reporting concerns and making a referral

**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 (page 14) illustrates the procedure to follow if you have any concerns about a child's welfare.**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by completing a Request for Advice and Support [Children's Services Portal site](#) or contact 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.

Dudley MARF: <https://childrensocialcare.dudley.gov.uk/web/portal/pages/home>

Exploitation Dudley screening tool – Dudley exploitation tool kit is used to identify children and young people at risk or experiencing exploitation which is then sent alongside a request for help form to the front door to identify additional support required through the exploitation panel. <https://dudleysafeguarding.org.uk/children/professionals-working-with-children/child-exploitation/>

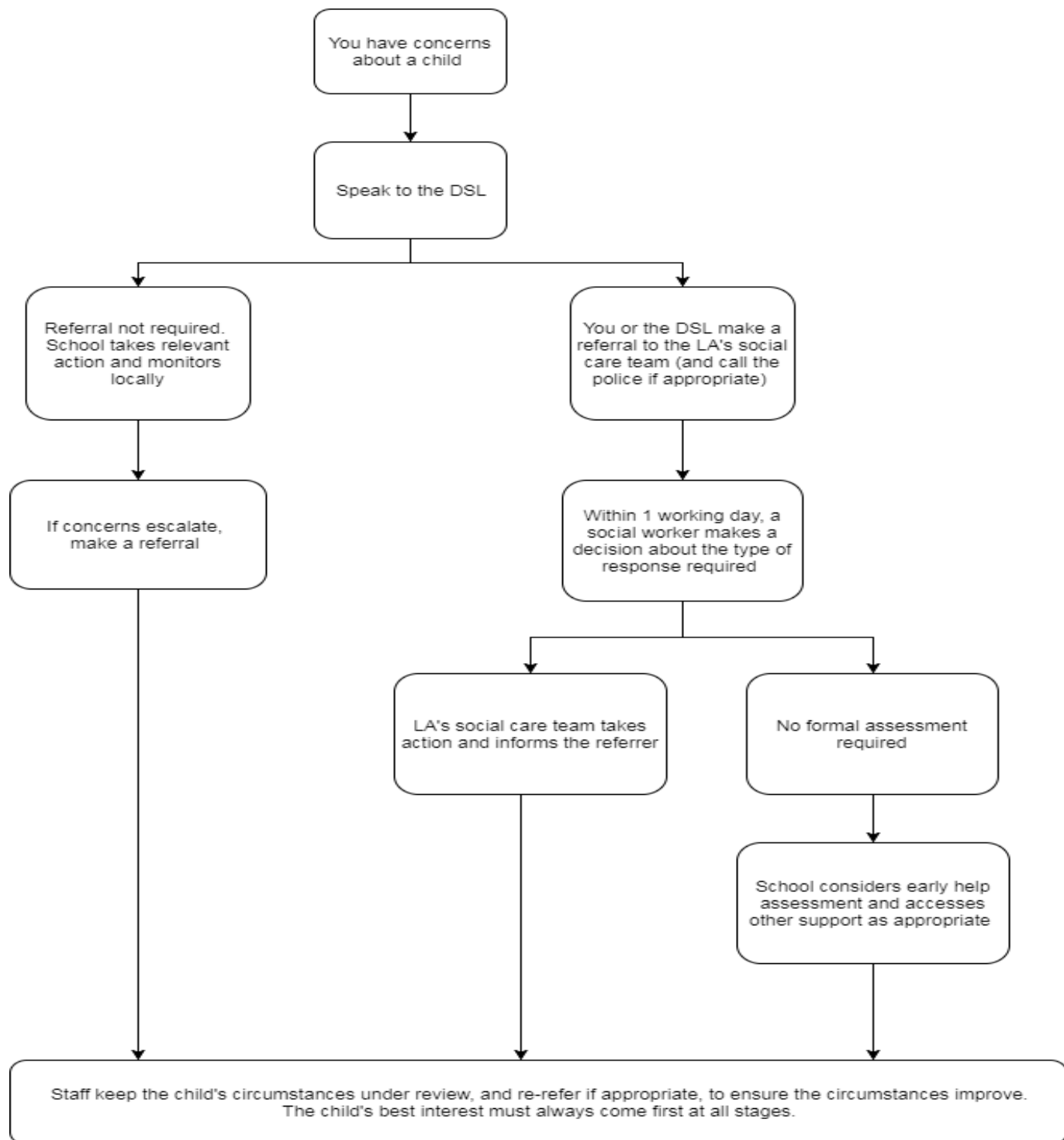
You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

The Local Authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Advice and further information on Dudley Professional Resolution should be accessed from the Lead for Safeguarding in Education, Dudley local authority further information is available on the Dudley Safeguarding partnership website.

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



### 13. Record keeping

We will hold records in line with our MAC records retention schedule.

All safeguarding concerns, discussions, decisions made and the reason for those decisions will be recorded and stored on the schools safeguarding online platform 'Safeguard'.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be transferred within 5 days after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely, within 5 school days of starting at the new education setting, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information (using the pupil safeguarding form) to enable them to have time to make any necessary preparations to ensure the safety of the child.

### 14 Thresholds and Early Help

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

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

Dudley Safeguarding Partnership threshold guidance is below, this should be considered when completing Request for Help and Support Form

Dudley Early Help information leaflet: <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>

<https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/#accordion-flacb0>

### 15 When to be concerned

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. **Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of**

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

### **15.1 Signs and Symptoms of Abuse**

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

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

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

**Emotional abuse may involve:**

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

### **Specific Safeguarding Issues**

For all the following issues, staff will receive training and support. They will be vigilant to nuanced indicators and whilst many of the risks are low in our school, we will maintain an attitude of 'it could happen here' Staff are encouraged to maintain an air of professional curiosity at all times.

With the exception of Female Genital Mutilation (FGM) where there is a mandatory personal reporting duty for all teachers, staff are expected to follow the school's reporting procedures and always seek advice from the DSL/Deputy DSLs where they are unsure or the potential risk is high enough to warrant immediate attention.

This section is based on the advice in Annex B of Keeping Children Safe in Education 2025

Annex B also includes information on further issues to be aware of, including children's involvement in the court system, children with family members in custody, and county lines.

#### *Human Rights Act*

*The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) that are deemed to apply in the UK. It compels public organisations to respect an individual's human rights.*

### **Child on child abuse**

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 between the 2.

#### **Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

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

- ✓ Is serious, and potentially a criminal offence
- ✓ Could put pupils in the school at risk
- ✓ Is violent
- ✓ Involves pupils being forced to use drugs or alcohol
- ✓ Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Child on child abuse can also include the following:

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

### **Procedures for dealing with allegations of child-on-child abuse**

- 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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation
- The children involved will receive support following the incident
- All incidents will be recorded in line with our record keeping procedures

### **17.3 Creating a supportive environment in school and minimising the risk of child-on-child abuse**

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

- ✓ Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- ✓ Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ✓ Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ✓ Ensure pupils are able to easily and confidently report abuse using our reporting systems
- ✓ Ensure staff reassure victims that they are being taken seriously
- ✓ Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- ✓ Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- ✓ Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

**Ensure staff are trained to understand:**

- ✓ How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- ✓ That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- ✓ That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- ✓ Children can show signs or act in ways they hope adults will notice and react to
- ✓ A friend may make a report
- ✓ A member of staff may overhear a conversation
- ✓ A child’s behaviour might indicate that something is wrong
- ✓ That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- ✓ That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- ✓ The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- ✓ That they should speak to the DSL if they have any concerns
- ✓ That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, 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

## **Sharing of nudes and semi-nudes ('sexting')**

### **Responsibilities when responding to an incident**

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

#### **You must not:**

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. 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 image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- ✓ What further information is required to decide on the best response
- ✓ Whether the image(s) 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 or videos 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/carers should be involved)

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

- ✓ The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- ✓ 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 SEN)
- ✓ What the DSL knows about the images or videos 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 images or videos is under 13
- ✓ The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (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 Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **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 to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

### **Informing parents/carers**

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

### **Referring to the police**

Recording incidents: all incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

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

### **If you discover that FGM has taken place or a pupil is at risk of FGM**

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

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

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

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

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

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

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

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

## **1 Forced Marriage**

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

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

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

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

The DSL will follow the local safeguarding procedures and refer the case to the local authority's designated officer, seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmua@fco.gov.uk](mailto:fmua@fco.gov.uk) and provide support from professionals as appropriate.

### **Serious violence**

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

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

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

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

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

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. It may involve an 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.

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 forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), 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
- ✓ 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

Once informed, the DSL will make referrals to the appropriate partners.

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

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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.

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 sexually explicit images of themselves, 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 suspects 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.

### **Children who are absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues.

There are many circumstances where a child may be absent or 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.. 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.

Relevant staff will be vigilant with regard to specific absence related safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

### **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, we will follow our school attendance policy procedures and contact the Education Investigation Service for further advice and support.

If there is a concern about a child being abducted and/or there is a potential community safety incident, then the DSL or deputy should be informed immediately. The school will then follow the local authority's procedures if a child is at risk of harm.

### **Homelessness**

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

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

### **Domestic Abuse**

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

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

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

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

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

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

### **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.

### **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

We will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

- ✓ Challenging inappropriate behaviours
- ✓ Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- ✓ Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them

### **Radicalisation and Extremism**

#### **Definitions**

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

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

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

**Terrorism** is an action that:

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

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

### **Preventing Radicalisation**

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies.

We will assess the risk of children in our school from becoming involved with or supporting 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 radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

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

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

- ✓ Accessing extremist material online, including on Facebook or Twitter
- ✓ Possessing extremist literature
- ✓ Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

Staff should **always** take action 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 the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE 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

### **Mental Health**

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 Mrs Rachel Mitchell. The school will follow the Department for Education guidance on [mental health and behaviour in schools](#). If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

### **LGBT+ pupils**

The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

### **Online Safety and the use of mobile technology**

## 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, misinformation, disinformation, conspiracy theories, 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 and/or pornography), sharing other explicit images and online bullying; and

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

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

To address this, our school will:

- ✓ Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors.
- ✓ Adhere to the terms in the Emmaus Catholic Mac's Online Safety Policy (see website)
- ✓ 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 including any restrictions on staff use of phones including recording devices.
- ✓ Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- ✓ Staff induction will include training on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring.

Educate pupils about online safety including:

- ✓ The safe use of social media, the internet and technology
- ✓ Keeping personal information private
- ✓ How to recognise unacceptable behaviour online
- ✓ How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Parents/carers:

We will regularly communicate risks to parents/carers and provide information about online safety via our website. We will also share clear procedures with them so they know how to raise concerns about online safety

All pupils, parents/carers, staff, volunteers and governors sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

We will ensure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

### **Filtering and Monitoring**

We will work with our Central team to manage and monitor our filtering and monitoring systems to limit children's exposure to the 4 key categories of risk

Any breach of the filtering and monitoring systems in place is sent as an alert to the DSL who will triage and act appropriately.

We will work with our Central team and IT providers to carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

### **Children in Care (CiC) and Post Children in Care**

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

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

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

### **The Role of the Designated Teacher for Looked After Children**

Our Designated Teacher (DT) is Mrs Rachel Mitchell.

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

As part of their role, the designated teacher will:

- ✓ Be responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- ✓ Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- ✓ Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans
- Ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe with regard for their additional vulnerabilities.

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

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

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

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

### **Children with Special Educational Needs and Disabilities**

We recognise that pupils with special educational needs (SEN) 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.

The SENDCO in school is Mrs Rachel Mitchell. Please see the school's SEND policy for further details on the pastoral support provided for children with Special Educational Needs

### **Collection of pupils and non-collection of pupils at the end of the session/day**

Parents / carers inform school of the adults who are able to collect their child at the end of the school day. Any changes are communicated to the school office in line with the school's Arrival and Collection policy 2025. [St Joseph's Catholic Primary School Stourbridge - Policies and Documents](#)

If a child is not collected at the end of the session/day, we will:

- ✓ Attempt to make contact with the contacts we hold on file for the child
- ✓ If a child has not been collected by 3:30pm, and no contact has been made, the child will be sent to after-school club and the parent(s) charged appropriately
- ✓ If a child has not been collected by 4:15pm and no contact has been established, a call to Dudley Children's Front Door will be made

## **Safer Recruitment Procedure**

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2025. Please refer to the Emmaus Catholic MAC document Safer Recruitment and Selection Guidance for specific details of the recruitment and selection process at St Joseph's Catholic Primary School. We also follow Guidance for safer working practice for those working with children and young people in education settings (GSWP202) – addendum 2020.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

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

### **Shortlisting**

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

- ✓ Consider any inconsistencies and look for gaps in employment and reasons given for them
- ✓ Explore all potential concerns
- ✓ Once we have shortlisted candidates, we will ask shortlisted candidates to:
- ✓ Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can share relevant information and discuss it at interview stage.
- ✓ Sign a declaration confirming the information they have provided is true

### **The information we will ask for includes:**

- ✓ If they have a criminal history
- ✓ Whether they are included on the barred list
- ✓ Whether they are prohibited from teaching

- ✓ Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- ✓ Any relevant overseas information

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

### **Seeking references and checking employment history**

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

When seeking references, we will:

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

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

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

### **New staff**

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

- ✓ Verify their identity
- ✓ Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- ✓ Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- ✓ Verify their mental and physical fitness to carry out their work responsibilities
- ✓ Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- ✓ Verify their professional qualifications, as appropriate
- ✓ Ensure they are not subject to a prohibition order if they are employed to be a teacher
- ✓ Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- ✓ Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\*Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- ✓ Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- ✓ Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- ✓ Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

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

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

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

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

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

### **Agency and third-party staff**

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

### **Contractors**

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

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

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- ✓ Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- ✓ Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- ✓ Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- ✓ Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act

2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

- ✓ All governors will have an enhanced DBS check without barred list information.
- ✓ They will have an enhanced DBS check with barred list information if working in regulated activity.
- ✓ The chair of the board will have their DBS check countersigned by the secretary of state.
- ✓ All proprietors, trustees, local governors and members will also have the following checks:
- ✓ A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- ✓ Identity
- ✓ Right to work in the UK
- ✓ Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

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

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

#### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

### **Procedure for dealing with Allegations about Staff –**

#### **Concerns about a staff member, supply teacher or volunteer**

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.

The Emmaus Staff Code of Conduct policy [Staff Code of Conduct](#) provides further information and guidance that is followed by the school.

The school will work with other agencies to investigate when a member of staff has **“behaved or may have behaved in a way that indicates they may not be suitable to work with children”**

Allegations about supply teachers we will ensure allegations are dealt with appropriately when we are not the employer. Schools cannot simply cease to use this teacher. Processes should be developed to manage this akin to the disciplinary procedure and the school should advise supply agencies of its process for managing allegations.

Any concerns about the conduct of other adults in the school should be taken to the Principal.

The DSL will refer to part four of KCSiE when dealing with complaints and allegations about staff.

### **Procedure for dealing with complaints and allegations about the headteacher or proprietor**

Concerns about the Principal should go to the Chair of Governors.

The Local Authority Designated Officer (LADO)

The DSPP allegations process is managed by the LADO who is responsible for:

Managing individual cases

Providing advice and guidance

Liaising with police and other agencies

Monitoring progress of cases for timelines, thoroughness and fairness

Referral pathway – All statutory partner agencies are required to report all allegations to the LADO within one working day. All referrals should be sent to [allegations@dudley.gov.uk](mailto:allegations@dudley.gov.uk)

In Dudley, Yvonne Nelson-Brown is responsible for managing allegations and reports to Dudley Safeguarding People Partnership. [Yvonne.nelson-brown@dudley.gov.uk](mailto:Yvonne.nelson-brown@dudley.gov.uk)

**Ofsted 0300 123 3155 [www.ofsted.gov.uk](http://www.ofsted.gov.uk) Whistle Blowing Hotline**

**NSPCC 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk)**

The Principal will follow the procedures set out in appendix 1, if appropriate.

### **Staff concerns that do not meet the harm threshold.**

The school's approach, definition and procedures for low-level concerns that do not meet the harm threshold is covered in appendix 1

### **Whistleblowing**

St Joseph's Catholic Primary School is committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimization. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity of the worker become embedded into every aspect of school life and these policies are reviewed regularly in this regard. Refer to the Emmaus MAC Whistleblowing policy for further information [Whistle Blowing policy](#)

### **Safeguarding in the Curriculum**

At St Joseph's Catholic Primary we ensure that children are taught about how to keep themselves and others safe, including online. At this school, we recognise that effective education will be tailored to the specific needs and vulnerabilities of individual children,

including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). Pupils are taught appropriate information about safeguarding and how to keep themselves safe throughout several areas of the curriculum. There is a planned and progressive online safety programme and explicit lessons throughout the year around items such as staying safe, when to talk and consent. Learning opportunities are embedded into the curriculum throughout the school and are taught in all year groups. All staff have a responsibility to promote good online practices. Further information about the schools safeguarding curriculum and practices can be found here [St Joseph's Catholic Primary School Stourbridge - Safeguarding](#)

### **Special Circumstances**

Refer to the following policies and procedures which relate to the wider remit of safeguarding:

**Behaviour policy**  
**Exclusions policy**  
**SEND policy**  
**EYFS policy**  
**Intimate Care policy**  
**Care and Control policy**  
**Staff Code of Conduct**  
**Complaints policy**  
**Health and safety policy**  
**Attendance policy**  
**Online safety policy**  
**Equality opportunities policy**  
**RSE policy**  
**First aid policy**  
**Safeguarding curriculum documents available on the school website**  
**Privacy notices**  
**UK GDPR policy**  
**Whistleblowing policy**  
**Safer Recruitment policy**  
**Anti-bullying policy**  
**Supporting children with medical needs policy**  
**Supporting children with health needs who cannot attend school policy**  
**Children protection and safeguarding statement**  
**IT / Acceptable Use policy**  
**Arrival and collection of children policy**

### **Complaints Procedure**

Please refer to the Emmaus Catholic Multi Academy Company complaints policy

[Emmaus Complaints Policy Version 8.0.pdf](#)

## **Appendix 1: Allegations of abuse made against staff**

Section 1: allegations that may meet the harms threshold

This section applies to cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

Behaved in a way that has harmed a child, or may have harmed a child, and/or

Possibly committed a criminal offence against or related to a child, and/or

Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult the local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Advice and support from HR will be sought for any case.

A 'case manager' will lead any investigation. This will be the principal, or the chair of governors where the principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

Redeployment within the school so that the individual does not have direct contact with the child or children concerned

Providing an assistant to be present when the individual has contact with children

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work within the company

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

**If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

**If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

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

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

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

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

→ Who needs to know about the allegation and what information can be shared

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## **Record-Keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- ✓ A clear and comprehensive summary of the allegation
- ✓ Details of how the allegation was followed up and resolved
- ✓ Notes of any action taken, decisions reached and the outcome
- ✓ A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## **References**

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

## **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- ✓ Issues arising from the decision to suspend the member of staff
- ✓ The duration of the suspension
- ✓ Whether or not the suspension was justified

The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## **Appendix 2**

### **Concerns that do not meet the harm threshold**

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

#### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – 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 designated officer at the local authority

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

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

Humiliating pupils

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- ✓ Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- ✓ Empowering staff to share any low-level concerns as per section 7.7 of this policy
- ✓ Empowering staff to self-refer
- ✓ Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- ✓ Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- ✓ Helping to identify any weakness in the school's safeguarding system

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

If the concern is raised via a third party, the principal will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously and to the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- ✓ Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- ✓ Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- ✓ Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.