

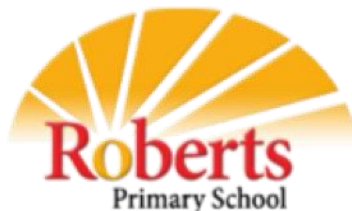
Roberts Primary School

Safeguarding and Child Protection

Policy 2025-2026



Date Revised	August 2025
Date of Next Review	Autumn 2026
Approved by Governors	September 2025
Approved By	Mr C Watkins (Headteacher) Mrs S Smith (chair of Governors)



Roberts Primary School

Safeguarding and Child Protection Policy

Date	Review Date	Designated Safeguarding Lead	Deputy Designated Safeguarding Leads	Nominated Governor
August 2025	September 2026	Mr Carl Watkins Headteacher	Miss Vicky Cockell Mr Ken Hughes Miss Rebecca Beddoes Miss Sarah Burns Miss Caroline Gregory	Mr Allan Gillhooley

Policy Tracker – Responsibility for monitoring this policy:

Carl Watkins

(Reviewed Annually or in response to changes in legislation or LSCB operating procedures)

Date	Reviewed By:	Role	Date Approved by the Governing Board
09.10.2019	Governing Board	Chair	09.10.2019
06.10.2020	Governing Board	Chair	06.10.2020
05.10.2021	Governing Board	Chair	06.10.21/14.12.21
05.10.22	Governing Board	Chair	05.10.22
27.09.23	Governing Board	Chair	11.10.23
02.09.24	Governing Board	Chair	25.09.24
01.09.25	Governing Board	Chair	

To be read in conjunction with:

Acceptable Use	Designated Teacher for	Looked After Pupils Policy
Accessibility Plan	Looked-After and Previously	(including post LAC)
Anti-Bullying	Looked-After Pupils	Management of Allegations
Attendance and Punctuality	Educational Visits	Medical Needs
Behaviour	Equal Opportunity	Nursery Admission
British Values	Equality	Online Safety
Complaints	Exclusion Procedures	Curriculum
Code of Conduct (see appendix)	First Aid	Physical Intervention/Positive Handling
Citizenship	GDPR	Privacy Notices
Pupils Missing Education	Health and Safety	Relationships and Sex Education
Data Protection and Confidentiality	Intimate Care	RSHE
	KCSiE 2025	
	Local Authority Admissions	

Safer Recruitment
Special Educational Needs
Staff Code of Conduct

Visiting Speakers
Whistleblowing

Designated Lead Person for Child Protection: Mr Carl Watkins – Headteacher
Contact Details: Tel: 01384 987330 - Email: cwatkins@roberts.dudley.sch.uk

Designated Lead Person for Child Protection: Miss Vicky Cockell- Pastoral Manager
Contact Details: Tel: 01384 987330 - Email: vcockell1@roberts.dudley.sch.uk

Deputy Designated Lead Person for Child Protection: Mr Ken Hughes
Contact Details: Tel: 01384 987330 Email: khughes@roberts.dudley.sch.uk

Deputy Designated Lead Person for Child Protection: Miss Rebecca Beddoes
Contact Details: Tel: 01384 987330 Email: rbeddoes@roberts.dudley.sch.uk

Deputy Designated Lead Person for Child Protection: Miss Sarah Burns
Contact Details: Tel: 01384 987330 Email: sburns@roberts.dudley.sch.uk

Designated Lead Person for Child Protection: Miss Caroline Gregory
Contact Details: Tel: 01384 987330 - Email: cgregory@roberts.dudley.sch.uk

Named Governor for Safeguarding & Child Protection: Mr Allan Gillhooley
Contact Details: 01384 987330

School CLA Designated Person: Mr Carl Watkins – Headteacher
Contact Details: Tel: 01384 987330 Email: cwatkins@roberts.dudley.sch.uk

Privately Fostered named person: Mr Carl Watkins

Privately Fostered named person (Dudley LA): Angela Marsh

School Online Safety Lead: Mr Ken Hughes 01384 987330 Email khughes@roberts.dudley.sch.uk

Local Authority Designated Officer (LADO), for allegations against staff:
Yvonne Nelson-Brown, Tel: 01384 813110, and Sukhchandan Kaur, Tel: 01384813061
Safeguarding in Education Lead: Yvonne Nelson Brown.
Referral email: allegations@dudley.gov.uk

Chair of Governors: Mrs Sue Smith - Contact Details: 01384 987330

Vice-Chair of Governors: Mr Steve Marsh/Mr Stewart Wright - Contact Details: 01384 987330

MASH Education Officer: Diane Green MASH: 0300 555 0050

Out of Hours Duty Team: 0300 555 8574

Dudley Prevent Education Officer: Mark Wilson
Dudley Prevent Team: 01384 816883/07966 503370
email: Mark.Wilson@dudley.gov.uk

Community Engagement Officer: Samantha Hughes Contact Details: 07795667538
Child Sexual Exploitation (CSE) Team: 01384 717777 Email: CSE.Team@dudley.gov.uk

Referral Pathway into Exploitation HUB: CS.Hub@dudley.gov.uk

Head of Service: Karen Graham

Lead for Safeguarding in Education: Jane Dickens

Tel: 01384 810000 Email: Jane.Dickens@dudley.gov.uk

Named Virtual Head: Andrew Wright

andrew.wright@dudley.gov.uk

Mental Health Lead for Roberts Primary School: Mr Carl Watkins (Headteacher)

Contact Details: Tel: 01384 987330 Email: cwatkins@roberts.dudley.sch.uk

Child Protection and Policy Statement

Pupils and young people have a fundamental right to be protected from harm. They have a right to expect schools to provide a safe and secure environment. It is a guiding principal of the law and child protection procedures that the protection and welfare of a child must always be the first priority. Failure to provide an effective response can have serious consequences for the child.

Safeguarding and promoting the welfare of pupils is defined for the purposes of this guidance as:

- 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

Roberts Primary School recognises its legal duty under s175/157 Education Act 2002 to work with other agencies in safeguarding and promoting the welfare of pupils and young people and protecting them from "significant harm".

The protection of our pupils from suffering or being likely to suffer significant harm is the responsibility of the school and wider community, superseding any other considerations. The following documents, circulars and guidance for good practice govern child protection work at Roberts Primary School.

Safeguarding is what we do for all pupils and young people to keep them safe whilst in our care. Child protection describes the policy and procedures specifically for those young people who are at risk of serious harm or have been seriously harmed.

Purpose and Aims

The school aims to ensure that:

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

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

We give special consideration to pupils who:

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

- Whose parent/carer has expressed an intention to remove them from school to be home educated.

Statutory Framework

This policy is based on the Department for Education's (DfE's) statutory guidance, Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2025), the Maintained Schools Governance Guide and Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

https://assets.publishing.service.gov.uk/media/681b42043f1c73824ee3e4f0/Children_and_young_person_guide_to_working_together_to_safeguard_children.pdf

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

The staff at Roberts Primary School recognise and are committed to fulfilling its statutory responsibility to safeguard and promote the welfare of pupils in accordance with the following legislation and guidance:

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under 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

Multi-Agency Working:

That our school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Pupils

- We, the Senior Leadership Team and the Designated Safeguarding Leads/Deputy DSLs understand our role in the new safeguarding partner arrangements
- We co-operate and engage fully with the new published safeguarding arrangements and do not work in isolation.
- Our school will work with social care, the police, health services and other services to promote the welfare of pupils and protect them from harm. This includes providing a co-ordinated offer of Early Help when additional needs of pupils are identified and also contributing to inter-agency plans to provide additional support to pupils subject to child protection plans.
- Our school will allow access for children’s social care from various local authorities pertaining to the individual children/child for that authority to conduct, (or to consider whether to conduct), a section 17 or a section 47 assessment within the school. The school will also allow local authorities to complete work with the pupil within the school environment in question without obtaining the permission of parents

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

- The Local Authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- Chief Officers of police forces

The links for Dudley’s procedures are:

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

Dudley Safeguarding Partnership Priorities 2024-26

Three safeguarding priorities have been identified for 2024-2026:

- 1.Mental Health of Children, Young People and Adults with care and support needs, including the impact of parental mental health
- 2.Transitional Safeguarding
- 3.Exploitation

These are detailed further on the above website and are included in whole school training.

Principals and Core Values

Roberts Primary School is committed to the safeguarding of all pupils in the school. Our aim is to ensure that all pupils are safe in school and that measures are put in place to support any child, who is at risk of harm. Overall the policy provides information for all adults working with pupils to carry out their duty of care responsibility. Roberts Primary School must provide information and training for all staff and other adults to carry out this duty of care responsibility.

The six main elements of the policy are:

- Ensuring we practise safe recruitment (please see page 46) in checking of staff and volunteers alongside working with agencies who themselves practice safer recruitment guidelines, when requesting Supply Staff.
- Raising awareness of child protection issues and equipping pupils with the skills needed to keep them safe.
- Implementing procedures for identifying and reporting cases, or suspected cases of abuse.
- Supporting pupils, who have been abused in accordance with his/her child protection plan.
- Establishing a safe environment in which pupils can learn and develop.
- Ensuring there are links with other safeguarding policies and procedures: for example, physical intervention, anti-bullying, behaviour

Designated Safeguarding Lead (DSL) and Deputies:

Designated Safeguarding leads at Roberts Primary School are:

- 1) Mr Carl Watkins (Headteacher)
- 2) Miss Vicky Cockell (Pastoral Manager)
- 3) Mr Ken Hughes (Deputy Headteacher)
- 4) Miss Rebecca Beddoes (Deputy Headteacher)
- 5) Miss Sarah Burns (Brightsparks)
- 6) Miss Caroline Gregory (Assistant Headteacher EYFS)

The DSL is a member of the senior leadership team. Our DSL is **Mr Carl Watkins (Headteacher)**

DSL takes lead responsibility for child protection and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The DSL is contactable out of school hours and during the holidays using the email safeguarding1@roberts.dudley.sch.uk.

When the DSL is absent, the deputies - Mr Ken Hughes (Deputy Headteacher), Miss Vicky Cockell (Pastoral Manager), Miss Rebecca Beddoes (Deputy Headteacher), Miss Caroline Gregory (Assistant Headteacher) and Miss Sarah Burns (Brightsparks) – will act as cover.

If the DSL and deputies are not available, all staff are able to contact Children's Services on 0300 5550 050.

Role and Responsibilities of Designated Safeguarding Lead

- The Designated Safeguarding Lead has ultimate responsibility and management oversight and accountability for safeguarding and child protection. There are four deputy safeguarding leads within school.
- When the school has concerns about a child, the Designated Safeguarding Lead will decide what steps should be taken. They will refer all cases of suspected abuse to pupils' social care) for child protection concerns, they will contact the LA designated officer for managing allegations (LADO, the DBS), and will contact the police in cases where a crime has been committed.
- The Designated Safeguarding Lead will take the role of the appropriate adult.

- Liaise with the deputy designated safeguarding lead regarding safeguarding issues, especially ongoing enquiries under section 47 of the Children's Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff members on matter of safeguarding by liaising with the three safeguarding partners, who are Local Authorities, chief officers of police and clinical commissioning groups
- Understand the assessment process for providing early help and intervention. Have a working knowledge of how to conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so. Dudley Early Help information leaflet <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>
- Ensure each member of staff has access to and understands the school's Child Safeguarding Policy and procedures, especially new and part-time staff members.
- Be alert to the specific needs of pupils in need, including those with special educational needs and/or disabilities and young carers.
- Be able to keep detailed, accurate and secure records of concerns and referrals.
- Obtain access to resources and attend any relevant training courses
- Encourage a culture of listening to pupils and taking account of their wishes and feelings.
- Ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated and reviews regularly, and work with the governing body regarding this duty.
- Ensure the school's Child protection and Safeguarding policy is available publicly and parents are aware of the fact that referrals regarding suspected abuse or neglect may be made in the role of this.
- Link with the Local Safeguarding Arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
- Child protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom and when.
- CPOMS is used to document child protection records. Files will be kept for at least the period during which the child is attending school, and beyond that in line with current data legislation and guidance.
- Access to these records by staff other than by the Designated Safeguarding Lead and Deputies will be restricted.
- Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home/school policies and give due regard to which adults have parental responsibly.
Roberts Primary School will not disclose to a parent any information held on a child if this would put the child at risk of harm.
- If a pupil/student moves from our school, child protection records will be forwarded onto the Designated Safeguarding Lead at the new school. With due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. We will record where and to whom the records have been passed and the date.
If sending by post, pupil records will be sent by "Special/Recorded Delivery". For audit purposes a note of all pupil records transferred or received should be kept in electronic format on the appropriate Management Information System. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.
- If a pupil is permanently excluded and moves to a Pupil Referral Unit, child protection records will be forwarded on to the relevant organisation.
- When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there will be a full face-to-face handover/exchange of information with the new post holder.
- Understand and support the school with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting pupils from the risk of radicalisation.

- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep pupils safe whilst they are online at school.
- Recognise the additional risks that pupils with Special Educational Needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND pupils to stay safe online.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that pupils, including pupils with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school and their staff, know who these pupils 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 pupils in this group might face and the additional academic support and adjustments that they could make to best support these pupils.
- The DSL and/or Head Teacher will complete a Safeguarding Report for Governors at least annually.
- Have a good understanding of harmful sexual behaviour
- Have a good understanding and takes the lead of the filtering and monitoring systems and processes in place at our school, this is included in the DSL's job description
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

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. All verbal conversations with DSL should also then be promptly recorded in writing
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that pupils, including pupils 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 pupils 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 pupils in this group might face and the additional academic support and adjustments that they could make to best support these pupils.
- Refer cases of suspected abuse and neglect to the local authority Children's social care as required and support staff who make referrals to local authority Children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and
- Refer cases where a crime may have been committed to the Police
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

- Contribute to the assessment of pupils, particularly in relation to Early Help. Dudley Early Help information leaflet <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>
- Work closely with Mental Health Leads
- Refer suspected cases, as appropriate, to the relevant body (local authority childrens' social care, Channel Panel, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSL/deputies will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

The Headteacher and Governing Body

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

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

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

The Governing Body/Trust will appoint a senior board level (or equivalent) lead, Mr Allan Gillhooley, 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, Mrs Sue Smith, will act as the 'case manager' if an allegation of abuse is made against the Headteacher, where appropriate.

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

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

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 child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Other areas of assurance include:

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

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

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

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

Our safeguarding responsibilities include:

- Protecting pupils from maltreatment
- Preventing impairment of pupils' mental and physical health or development
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all pupils to have the best outcomes

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

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.

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

Children includes everyone under the age of 18.

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

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

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

Roles and Responsibilities

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

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

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 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. Dudley Early Help information leaflet <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>
- 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
- All staff have a responsibility to provide a safe environment in which pupils can learn;
- All staff have a responsibility to identify pupils who may benefit from early help or who are suffering, or are likely to suffer, significant harm Dudley Early Help information leaflet <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>;
- Any staff member who has a concern about a child must follow the referral process;
- All staff have a responsibility to take appropriate action, our staff will be expected to support social care and other agencies following referrals;
- In addition to working with the designated safeguarding lead or deputy designated safeguarding lead staff members should be aware that they may be asked to support social workers and other agencies to take decisions about individual pupils;
- During induction, all staff members will be made aware of the systems within our school which support safeguarding systems, and these will be explained to them as part of their induction. This includes: the safeguarding and child protection policy; the staff behaviour policy/code of conduct; the school behaviour policy, Keeping Children Safe in Education - part 1, Annex A, Annex B- the role of the designated safeguarding lead and the names of the designated safeguarding lead and deputies;
- All staff members will receive appropriate safeguarding/child protection updates regularly, but at least annually;
- All staff will be made aware of the local early help process and understand their role in it Dudley Early Help information leaflet <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>;
- All staff will be made aware of the process for making referrals to Children's social care via the Front Door and for statutory assessments, especially pupils in need (section 17) and a child suffering, or likely to suffer, significant harm (Section 47) that may follow a referral along with the role that they may be expected to play in such assessments;
- All staff will be made aware of what to do if a child discloses that he/she is being abused or neglected
- All staff members will be made aware of the types and signs of abuse and neglect so that they can identify cases of pupils who may need help or protection;

- 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 in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy.
- Staff should ensure that if a child has made a disclosure, they are aware that the information will only be shared with the designated safeguarding lead and Children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse;
- Staff should share the information and concerns as soon as possible in case intervention is needed to keep a child safe.
- Our staff will be alert to the potential need for any child who: is disabled and has specific needs; has special educational needs; is a young carer; is showing signs of being drawn into anti-social behaviour including gangs and organised crime; frequently goes missing from care or home, is misusing drugs or alcohol themselves; is at risk of modern slavery, trafficking or exploitation; is in a family circumstance presenting challenges for the child; has returned home to their family from care; is showing early signs of abuse and/or neglect; is at risk of being radicalised or exploited and is a privately fostered child;
- All staff should speak to the designated safeguarding lead with regards to any concerns about female genital mutilation. Our teachers know that there is a legal duty placed upon, teachers must report to the police if they discover that an act of female genital mutilation appears to have been carried out on a girl under the age of 18;
- If staff have concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to pupils, then the concern should be referred to the Headteacher as soon as possible. If the concern is about the Headteacher, the member of staff should report this to the Chair of Governors. Our staff will comply with the guidelines in **part four** of Keeping pupils safe in education;
- All staff and volunteers should raise concerns about poor or unsafe practice and potential failures in our school's safeguarding regime. Staff should follow the school's whistleblowing policy and procedures or contact the NSPCC whistleblowing helpline.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct for Employees at Roberts Primary School, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to pupils who go missing from education

- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment. Dudley Early Help information leaflet <https://dudleysafeguarding.org.uk/wp-content/uploads/2025/03/Early-Help-A5-4pp-Leaflet-v2.pdf>
- 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 and neglect, as well as specific safeguarding issues, such as child exploitation Child Sexual Exploitation (CSE)/Child Criminal Exploitation (CCE) indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

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.

- All staff will undertake annually training on 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/students.
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify pupils 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.
- Volunteers and Contractors will receive appropriate training, if applicable.

In schools, relevant topics will be included within Relationships Education and Health Education. In teaching these subjects schools must have regard to the [statutory guidance](#).

Schools play a crucial role in **preventative education**. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The school will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based Personal, Social, Health Education delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme should be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of pupils with SEND and other vulnerabilities). This program will tackle at an age-appropriate stages issues such as:

- healthy and respectful relationship
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse,
- grooming, coercion, harassment, rape, domestic abuse, so called honour-based
- violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

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.

Staff Support

We recognise the stressful and traumatic nature of child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and seek further support as appropriate.

Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- ✓ Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- ✓ Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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.

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

Safeguarding governors are integral liaisons between a school and a governing body. The named Governor for Safeguarding & Child Protection for Roberts Primary School is Mr Allan Gillhooley. They are crucial for a number of reasons, including being responsible for:

- Ensuring a school has an effective safeguarding policy in place.
- Ensuring safer recruitment practices are put in place.
- The creation and foreseeing over of abuse allegation procedures.
- Maintaining a good working relationship between the school they represent, local government bodies and any external organisations, such as charities or child welfare institutions.
- Promoting safeguarding pupils training for all school staff and making sure this training is of a high caliber and up-to-date.
- Ensuring all school policies are focused on the pupils, considers all possible safeguarding issues and are reviewed on a regular basis.
- Review of section 175 audit.

It is the responsibility of governing bodies to ensure that they comply with their duties under legislation. They must have regards to this guidance to ensure that the policies, procedures and training in their schools are effective and comply with the law at all times. Safeguarding is on the agenda **at all** Governing Body Meetings. The governing body is also responsible in managing allegations against the Headteacher. Governing Bodies recognises its legal duty under s.175/157 Education Act 2002.

Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Governing bodies and proprietors should ensure that pupils are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual pupils, including pupils who are victims of abuse, and pupils with special educational needs or disabilities.

The statutory guidance, Keeping Children Safe in Education 2025 (Part 2, Annex B) places statutory requirements on all governing bodies. Governing bodies must make sure that their school has an effective Child Protection policy and appropriate policies and procedures in place and take into account any guidance issued by the Secretary of State, any LA guidance and locally agreed inter- agency procedures. These policies are updated annually or as required. The governing body has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Ensure that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Ensure that the school contributes to the inter-agency working in line with the statutory guidance 'Working Together to Safeguard Pupils (2018).
- Ensure that the school's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter-agency safeguarding procedures established by the Local Safeguarding Arrangements.
- Ensure that the Chair of Governors (**Mrs Sue Smith**) will liaise with the Local Authority in the event of allegations of abuse made against the Headteacher or other Governor.
- Ensure that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Consider how pupils may be taught about safeguarding, including protection for dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Prevent people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check staff who work with pupils, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- Ensure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that there are procedures in place to handle allegations against members of staff or volunteers.
- Ensure that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS). If a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned - this is a legal duty.
- Ensure that there are procedures in place to handle allegations against other pupils.
- Ensure that the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Ensure that the child has been "heard" and the voice of the child has been recorded in their own words.
- Ensure that there are systems in place for pupils to express their views and give feedback.
- Ensure that there is a designated person to promote the educational achievement of 'Pupils Looked After' and ensure that this person has undergone appropriate training.
- Ensure all staff members have the skills, knowledge and understanding necessary to keep 'Pupils Looked After' safe, particularly with regard to the child's legal status, contact and care arrangements.
- Put in place appropriate safeguarding responses to pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse.

Staff Who Have Contact with Pupils and Families

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

Information Sharing Confidentiality

➤ Our school understands that timely information sharing is essential to effective safeguarding and is vital in identifying and tackling all forms of abuse and neglect.

- The staff at Roberts Primary School understand and recognise the importance of information sharing between practitioners and local agencies. We will ensure arrangements are in place that set out clearly the process and principles of information sharing within the school and with the three safeguarding partners, other organisations, agencies and practitioners as required.
- The staff at Roberts Primary School understand the Data Protection Act 2018 and the GDPR places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- The staff at Roberts Primary School understand the Data Protection Act 2018 and the GDPR are not barriers to sharing information where the failure to do so would result in a child being placed at risk of harm.
- The staff at Roberts Primary School will ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping pupils safe. **Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of the pupils.** 'Safeguarding of pupils and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.
- Our Governors will ensure that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of pupils and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing 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.
- If our school is unable to provide pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we should withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt our school will seek independent legal advice.
- Where pupils leave our school, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt will be obtained from the receiving school or college. The file will be transferred separately from the main pupil file. Our school will ensure key staff such as designated safeguarding leads and SENDCOs or the named person with oversight for SEND in a college, are aware as required.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping pupils 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
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)
- In addition to the child protection file, our designated safeguarding lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Communication with Parents

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

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

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority pupils' 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)

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 can report concerns to any member of staff and are made aware of this within RSHE and general discussions. Pupils will be made to feel safe though being given reassurances following any disclosures.

Whole Staff Responsibilities

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

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

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

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

Request for help and support <https://childrensocialcare.dudley.gov.uk/web/portal/pages/home>

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions or close them down – this may be their only chance at disclosing something
- 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 pupils' 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

Record Keeping

Roberts Primary School will ensure that all staff are aware of the following:

- We will hold records in line with our records retention schedule (see APPENDIX 1.0: Data Retention Schedule of Your IG's Data Retention Policy for Schools with respect to recruitment and pre-employment checks allegations of abuse made against staff and staff low level concerns).
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.
- All safeguarding concerns will be recorded using CPOMS.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely, within 5 school days of starting at the new education setting, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information (using the pupil safeguarding form) to enable them to have time to make any necessary preparations to ensure the safety of the child.
- Appropriate use of handwritten/electronic systems/factual evidence-based accounts/record in writing within 24 hours/signed and dated.
- Kept securely away from other pupil files.
- Body map's and genograms used should be used in accordance with your recording guidance.
- Secure transfer of safeguarding/CP records which are separately to other pupil files/receipt obtained from receiving school.

- At no time should an individual teacher/member of staff consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.
- Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the child's social worker if already an open case to social care.

Reporting Concerns and Making a Referral

All concerns will be recorded on CPOMS

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 22) 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 via the [Children's Services Portal](#) 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.

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.

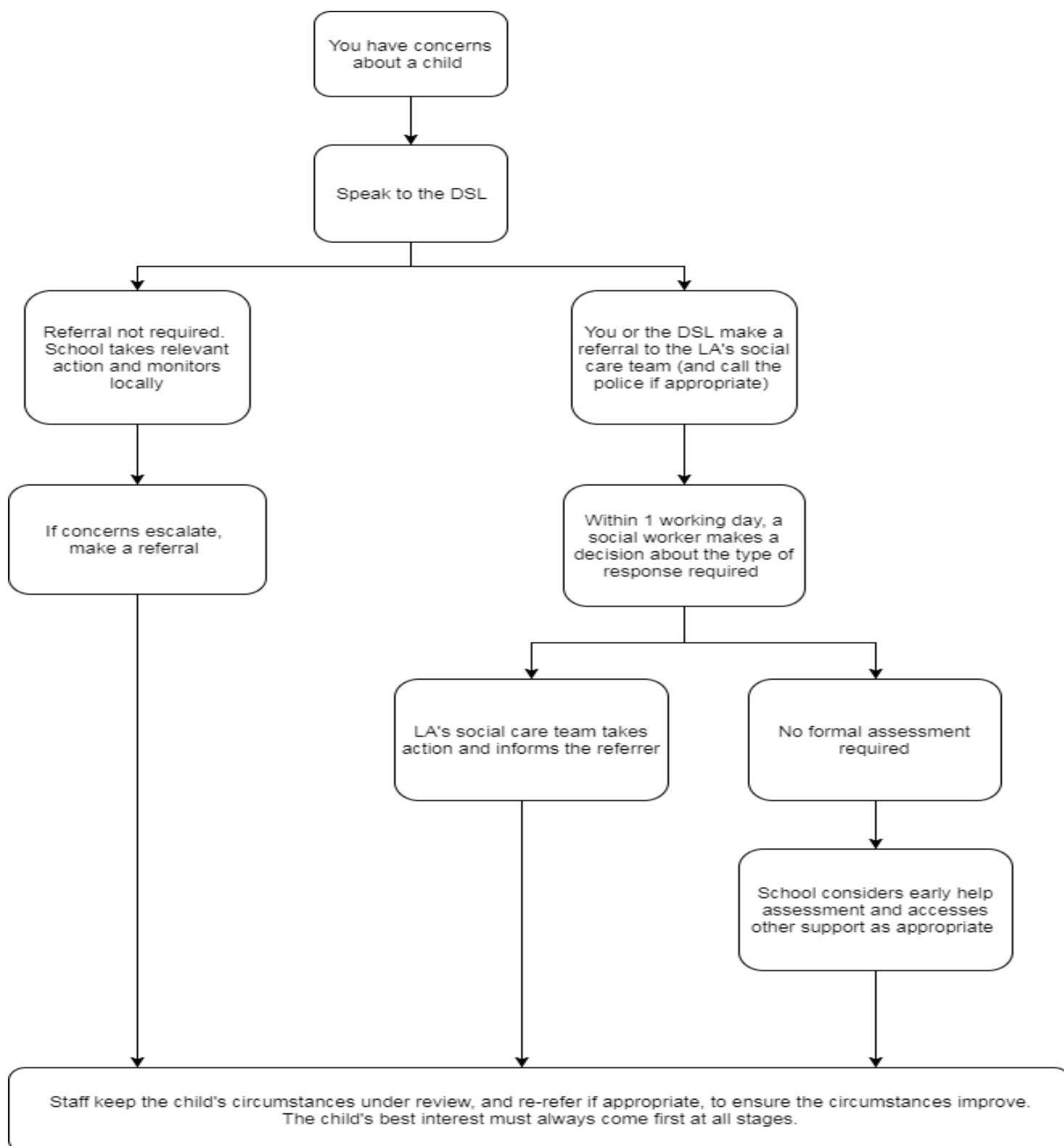
If it is appropriate to refer the case to Local Authority Children's Social Care or the Police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

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.)



Dudley's Thresholds and Early Help

If Early Help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an 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 childrens' social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

[Dudley Safeguarding Partnership threshold guidance](https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/#accordion-flacbo) should be considered when completing Request for Help and Support Form- <https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/#accordion-flacbo>

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

When to be Concerned

Signs and Symptoms of Abuse

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.

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 pupils. 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 pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils

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 pupils in looking at, or in the production of, sexual images, watching sexual activities, encouraging pupils 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 pupils.

Some signs:

- Aggression
- Withdrawn
- Self-harming, including eating disorders
- Distrust of familiar adult
- Wetting or soiling day and night
- Fear of undressing for sport or swimming
- Sleep disturbances or nightmares
- Apparent secrecy about social activities or special friends
- Inappropriate sexualized conduct
- Drawings of sexual behaviours
- Sexually explicit behaviour

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.

If staff recognise any of these signs, they should not presume that the child is being abused but **MUST** report their concerns to the designated safeguarding lead or the deputy designated safeguarding lead immediately.

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
- neglect of or unresponsiveness to a child's basic emotional needs
- Under weight for age
- Hungry
- Tired
- Poor state of clothing for the child's size, weather or time of year
- Persistently dirty with a body odour
- Frequent lateness or non-attendance
- Compulsive stealing or scavenging
- Poor health and untreated medical problems
- Lack of immunisations
- Frequently missed medical appointments

All staff, but especially the designated safeguarding lead (and deputies) should consider whether pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and pupils 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.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The list of signs is not an exhaustive list.

Specific Safeguarding Issues

All staff and volunteers are familiar with the types and signs of abuse, they are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff are expected to be vigilant at all times, taking account of the following:

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. Pupils may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or pupils.

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

Some signs:

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non-mobile pupils
- Injuries in unusual areas or with well - defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive
- Arms and legs kept covered in hot weather
- Reluctance to remove clothing for PE or swimming

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on pupils. 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils.

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

Some signs:

- Physical, mental or emotional development delay
- Abnormal attachment to parents/carer
- Low self-esteem
- Lack of confidence
- Over-reaction to making mistakes
- Fear of new situations
- Fear of parents being contacted
- Self-harm

Significant Harm- “Significant Harm is any Physical, Sexual or Emotional Abuse, Neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life. Harm is defined as the ill treatment or impairment of health and development.”

Domestic Abuse – Domestic abuse can take many forms, including psychological, physical, sexual, financial and emotional.

Roberts Primary School recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact on pupils. We will work with other key partners and share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

Psychological, Physical, Sexual, Financial and Emotional

Controlling behaviour is: A range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: An act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

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.

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.

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Female Genital Mutilation - 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.

Some warning signs:

- Difficulty walking, sitting or standing;
- Unusual behaviour after an absence from school;
- Age of the young girl (0-15 years);
- A young girl may visit the bathroom more frequently or spend more time than usual in the bathroom;
- A young girl may have frequent, urinary, menstrual or stomach problems;
- Prolonged or repeated absence from school;
- A young girl may try to avoid PE lessons;
- Travel to a country known to practise FGM (School holiday times);
- An Elder family member visiting from a country known to practise FGM;
- Over hearing conversations related to FGM;
- A young girl may disclose, ask questions or ask for advice;
- Reluctance to undergo normal medical examination; and
- Girls that are withdrawn from PSHE or SRE.

Indicators that FGM has already occurred include:

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

A girl:

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

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

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

A girl:

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

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

Forced Marriage

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

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

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

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

The DSL will:

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

Up-Skirting

The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. ‘Up-skirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. Up-skirting had been added into Sexual Harassment Section.

Child Sexual Exploitation

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

The abuse can be perpetrated by males or females, and pupils 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. Pupils or young people who are being sexually exploited may not understand that they are being abused. They often know and trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

Child Sexual Exploitation (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. Child Sexual Exploitation (CSE) may also occur without the victim's immediate knowledge, for example through others copying videos or images.

Like all forms of child sexual abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both;
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- Can be perpetrated by individuals or groups, males or females, and pupils or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

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

In addition to the Child Criminal Exploitation (CCE) indicators above, indicators of Child Sexual Exploitation (CSE) can include a child:

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

Child sexual exploitation is **never** the victim's fault, even if there is some form of exchange: all pupils and young people under the age of 18 have a right to be safe and should be protected from harm.

At Roberts Primary School we understand that any child in any community may be vulnerable to child exploitation and we will be alert to the fact that child sexual exploitation is complex and rarely presents in isolation of other needs and risks of harm (although this may not always be the case, particularly in relation to online abuse). Child sexual exploitation may be linked to other crimes and we will be mindful that a child who may present as being involved in criminal activity is actually being exploited.

At Roberts Primary School we are aware that the following vulnerabilities are examples of the types of things pupils can experience that might make them more susceptible to child sexual exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other pupils and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

We understand that not all pupils and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present.

Pupils rarely self-report child sexual exploitation so we understand it is vitally important that all staff at Roberts Primary School are aware that some of the following signs may be indicators of child sexual exploitation:

- Pupils who appear with unexplained gifts or new possessions;
- Pupils who associate with other young people involved in exploitation;
- Pupils who have older boyfriends or girlfriends;
- Pupils who suffer from sexually transmitted infections or become pregnant;
- Pupils who suffer from changes in emotional well-being;
- Pupils who misuse drugs and alcohol;
- Pupils who go missing for periods of time or regularly come home late; and
- Pupils who regularly miss school or education or do not take part in education.

We will remain open to the fact that child sexual exploitation can occur without any of these risk indicators being obviously present and be alert to the potential signs of abuse and neglect and to understand the procedures set out by local multi-agency safeguarding arrangements.

At Roberts Primary School we will provide information and raise awareness of Child Sexual Exploitation (CSE) including the signs, vulnerabilities and reporting procedures in line with WST guidelines

Our staff will report any concerns regarding pupils at risk of Child Sexual Exploitation (CSE) to the designated safeguarding lead or deputy who will then make a referral and liaise with other relevant statutory agencies, for example, social care, police and health professionals as required

Dudley CSE Co-ordinator- contact Nikki.Fernandes@dudley.gov.uk

To make a referral around any form of exploitation a Request for Help and Support form must be completed via the Dudley Childrens' Portal site. 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/>

A Child Exploitation Screening Tool should also be completed and emailed to the Multi Agency Safeguarding Hub at MASH_Referrals@dudley.gov.uk and CS.Hub@dudley.gov.uk

Child Criminal Exploitation (CCE) and County Lines

The definition of Child criminal exploitation (CCE) is “**where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual.**

Child Criminal Exploitation (CCE) does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation (CCE) can include pupils being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines) forced to shoplift or pickpocket, or to threaten other young people.

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

Some of the following can be indicators of Child Criminal Exploitation (CCE):

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

If a member of staff suspects Child Criminal Exploitation (CCE), they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's Children's social care team and, if appropriate, the police.

County Lines: County lines is a term used to describe **gangs and organised criminal networks involved in exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line"**. Exploitation is an integral part of the county lines offending model with pupils and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Pupils can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, pupils' homes and care homes. Pupils are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Pupils can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Consensual and Non-Consensual Sharing of Indecent Images

At Roberts Primary School we know and understand that sharing photos and videos online is part of daily life for many pupils, enabling them to share their experiences, connect with friends and record their lives.

Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as, Snapchat, WhatsApp or Facebook Messenger, etc.

The increase in the speed and ease of sharing imagery has brought concerns about pupils producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

Although the production of such imagery will likely take place outside of our school, these issues often manifest in schools and organisations working with pupils and young people. Our school will respond swiftly and confidently to ensure that pupils are safeguarded, supported and educated.

- Producing and sharing sexual images of under-18s is also illegal.
- Our school will deal with all incidents of youth produced sexual imagery as **a safeguarding concern**. We will be guided by the principle of proportionality and our primary concern will be the welfare and protection of the pupils involved. Our school may respond to incidents without involving the police in accordance with the guidelines set out in the UKCCIS- Sexting in schools and colleges: responding to incidents and safeguarding young people.
- Our school will adopt the recommended procedures regarding the law and handling incidents outlined in UKCCIS- Sexting in schools and colleges: responding to incidents and safeguarding young people and DfE guidance – Searching, screening and confiscation

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

Whilst dealing with an incident our school will:

- Respond immediately to disclosures or incidents in line with our school’s safeguarding procedures, staff will notify the designated safeguarding lead (Mr Carl Watkins) immediately of any concern, incident or disclosure
- Handle devices and imagery according to DfE advice (Searching, Screening and confiscation)
- Risk assess situations
- Involve other agencies, including escalation to the police and pupils’ social care
- Record incidents
- Involve parents
- Seek to support pupils
- Support pupils to report youth produced sexual imagery online.
- Provide preventative education

Initial Review Meeting

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

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

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

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

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

Further Review by the DSL

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

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

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

If it is necessary to refer an incident to the police, dependent upon the circumstances, this will be done through contacting local police community support officers, dialing 101 or 999.

Informing Parents

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

Recording Incidents

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

This policy is also shared with pupils through online safety lessons so they are aware of the processes the school will follow in the event of an incident.

Radicalisation and Extremism

Roberts Primary Lead for Single Point of Contact is: Mr Carl Watkins

Pupils are vulnerable to extremist ideology and radicalisation. Similar to protecting pupils from other forms of harms and abuse, protecting pupils from this risk will be a part of our school's/college's safeguarding approach.

- **Radicalisation** is the process of a person legitimising support for or use of terrorist violence. Children may be susceptible to radicalisation into terrorism
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

We understand there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, our staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral to the Channel programme/ liaising with safe & sound (Dudley's Community Safety Partnership - <https://www.dudleysafeandsound.org/prevent>)

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our reporting procedures including discussing their concerns with the DSL. Staff should **always** act if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including curriculum policy, behaviour policy, online policy.

At Roberts Primary School we will:

- Assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology;
- Work in partnership with parents, pupils, families and statutory agencies;
- Assess the risk in our local area and as a minimum our designated safeguarding lead will undertake Prevent awareness training to provide advice and support to other members of staff on protecting pupils from the risk of radicalisation; and
- Ensure that suitable filtering and monitoring is in place. Our pupils are taught to stay safe on-line. Online safety is integral to the school's IT curriculum.

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes;
- Glorifying violence, especially to other faiths or cultures;
- Making remarks or comments about being at extremist events or rallies outside school;
- Evidence of possessing illegal or extremist literature;
- Advocating messages similar to illegal organisations or other extremist groups;
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent);
- Secretive behavior;
- Online searches or sharing extremist messages or social profiles;
- Intolerance of difference, including faith, culture, gender, race or sexuality;
- Graffiti, art work or writing that displays extremist themes;
- Attempts to impose extremist views or practices on others;
- Verbalizing anti-Western or anti-British views; and
- Advocating violence towards others.

At Roberts Primary School, we aim to build the pupils' resilience to radicalisation by providing a safe environment and through particular aspects of the curriculum including Spiritual, Moral, Social and Cultural Education, British Values, Personal Social Health Education, Relationships Social Education and Citizenship.

Training on Prevent will be delivered as required to the relevant staff. Our school will use the e-learning links outlined in KCSiE if required. Our school will utilise the Department for Education advice for schools on the Prevent duty and other links and guidance outlined in KCSiE.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school, if required, will attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Our staff understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at: [Channel Guidance](#).

Our staff will co-operate with local Channel panel as required.

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 childrens' social care. Make a referral to local authority childrens' social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

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

Children Who Are Absent from Education

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

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

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

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

https://assets.publishing.service.gov.uk/media/65f1b048133c22b8eecd38f7/Working_together_to_improve_school_attendance_applies_from_19_August_2024_.pdf

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:

The following procedures will be followed in the event of a child going missing or getting lost:

1. The Headteacher must be informed immediately of the circumstances surrounding the child's disappearance.
2. The Headteacher will gather members of staff present and inform them of the situation.
3. The Headteacher will organise a thorough search of the premises and grounds. One member of staff must gather the remaining children in one room or area and stay with them to ensure they are supervised throughout.

If the child has still not been located a second search of the premises will be undertaken.

1. If the child still has not been accounted for the Headteacher will contact the police and the parents/carers of the missing child.
2. Staff must continue to search for the missing child until told to stop by the Headteacher. It is important that other staff remain calm.
3. The Headteacher must meet the police and parents/carers as soon as they arrive at the school or out of school club.
4. The police will then lead the investigation and the Headteacher will assist as much as possible and follow any actions as directed by the emergency services.

Please refer to Missing Child policy for full details.

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 two.

Child on Child Abuse: 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.

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)

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.

At Roberts Primary School, victims of sexual violence and/or sexual harassment will be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Child on Child Abuse: 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.

Child on Child Abuse: 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

Child on Child Abuse: 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 headteacher 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

If it is necessary to refer an incident to the police, this will be done through [insert details of your existing arrangements, e.g. a safer schools officer, a police community support officer, local neighbourhood police, dialling 101].

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 section 14 of this policy also apply to recording these incidents.

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:

- Inform the Headteacher/Deputy Headteacher/Brightsparks Manager immediately of the circumstances surrounding the child's disappearance.
- Organise a thorough search of the premises and grounds.
- Undertake a second search of the premises.
- If still not found, contact the police and the parents/carers of the missing child.

For full details, please refer to Roberts Primary School and Brightsparks Out of School Club Missing Child Policy.

Homelessness

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

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

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

Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two pupils of any age and sex. It can also occur through a group of pupils sexually assaulting or sexually harassing a single child or group of pupils. 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. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

KCSiE 2025 states that "it is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed by making a report"

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

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

All staff should be aware of the indicators, which may signal pupils are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of pupils and vulnerable adults: county lines guidance.

Mental Health - If you have a mental health concern

The mental health lead for Roberts Primary School is Mr Carl Watkins (Headteacher).

All staff at Roberts Primary School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We understand only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff however, are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where pupils have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Our staff are aware of how these pupils' experiences, can impact on their mental health, behaviour and education.

If any staff member has a mental health concern about a child that is also a safeguarding concern, immediate action will be taken. Following our child protection policy and they will speak to the designated safeguarding lead or a deputy immediately.

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.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action.

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 fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, pupils who are LGBT can be targeted by other pupils. In some cases, a child who is perceived by other pupils to be LGBT (whether they are or not) can be just as vulnerable as pupils who identify as LGBT.

Risks can be compounded where pupils who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavor to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Child Abduction and Community Safety Incidents

Child abduction is ***the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child***. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst pupils and parents, for example, people loitering nearby or unknown adults engaging pupils in conversation. As pupils get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building pupils' confidence and abilities rather than simply warning them about all strangers.

Pupils and the Court System

Pupils are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. [Appropriate guides](#) to support pupils 5-11-year olds explain each step of the process, support and special measures that are available. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for pupils. The Ministry of Justice has launched an [online child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Pupils with Family Members in Prison

Approximately 200,000 pupils in England and Wales have a parent sent to prison each year. These pupils are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [The National Information Centre on Pupils of Offenders, NICCO](#) provides information designed to support professionals working with offenders and their pupils, to help mitigate negative consequences for those pupils.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Pupils with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Staff at Roberts Primary understand that our school increasingly work online and that it is essential that pupils are safeguarded from potentially harmful and inappropriate online material.

Appropriate filters and appropriate monitoring systems are in place and we take care that “over blocking” does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

Education at home - Where pupils are being asked to learn online at home our school will refer to and use the links and resources provided by the DfE: safeguarding in schools, colleges and other providers and safeguarding and remote education.

Online Safety Curriculum and Computing, Use of Mobile Technology

(see Online Safety Policy for further information)

The Online Safety lead is Mr Ken Hughes.

The growth of different electronic media in everyday life and an ever-developing variety of devices including PC's, laptops, mobile phones, webcams etc. place an additional risk on our pupils. Internet chat rooms, discussion forums, social networks and the ability to live stream can all be used as a means of contacting pupils and young people with a view of grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be pupils, to have conversations with pupils and in some cases, arrange to meet them.

Access to abusive images is not a ‘victimless’ act as it has already involved the abuse of pupils. The internet has become a significant tool in the distribution of indecent photographs of pupils and should be a concern to all those working with pupils at our school.

Pupils can engage in or be a target of Cyber-bullying using a range of methods including text, sexting and instant messaging to reach their target. Mobile phones are also used to capture violent assaults and inappropriate images or other pupils for circulation (e.g. happy slapping/sexting).

The best protection is to make pupils aware of the dangers through age appropriate curriculum teaching particularly computing and IT lessons, PSHE and RSE. However not all pupils follow what has been taught and take risks. We co-operate with parent / carers and other agencies if out of school issues are brought to our attention. This can include involving the police or social care and we believe in working together in the best interests of all pupils.

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- 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

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - 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
- Train staff, as part of their induction, 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. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to 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
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure 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](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

- 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
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

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

At Roberts Primary School we: -

- Use Local Authority led filters, firewalls and monitoring to minimise access and to highlight any person or child accessing inappropriate sites or information
- Encourage pupils to discuss openly their use of technology and anything which makes them feel uncomfortable (if this results in child protection concerns the schools DSL will be informed immediately)
- Teach pupils not give out personal details, phone numbers, schools, home address, computer passwords and other secure information
- Pupils should adhere to the school policy on mobile phones. We do not allow pupils to bring mobile phones or other communication devices into the school, unless they are in Years 5 and 6 and only with written permission from the parents. Phones are then stored in the school office. If they do bring in phones and we do not have permission from parents, we will confiscate them and return them to the parent / carer at the soonest possible time
- Staff receive online safety and online training

The police will be involved and advice will be sought from CEOP if required if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

In addition, Roberts Primary will continue to monitor software used by our pupils to keep tabs on what sites are being visited it are trying to be visited

Children in Care (CiC) and Post Children in Care

The named designated person for Pupils in Care (CiC) is Mr Jake Stone.

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

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

We have appointed a designated teacher, Mr Carl Watkins, Headteacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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:

- 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
- Independent schools insert:
- 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
- We have appointed an appropriately trained lead, to promote the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- 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

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 and disabilities (SEND) 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 special educational needs and disabilities (SEND) being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

To address these additional challenges our school/college will consider extra pastoral support for these pupils when necessary.

We will ensure we have appropriate mechanisms in place to assist these pupils such as:

- Suitably qualified professionals (Inclusion manager and SEND lead)
- Effective training
- Referrals to specialist agencies
- Use of communication packages
- Use of signs and symbols
- One to one support for communication
- Appropriate IT aides

The SENDCo for Roberts Primary School is Mr Garry Dean.

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

- refer to your policy/procedure, to ensure all staff are aware of the safeguarding checks and reporting of concerns

Safer Recruitment Procedure

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2025. 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. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- We will also consider carrying out an online search on shortlisted candidates 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
- Dudley Local Authority will 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

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 pupils; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with pupils; 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.

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.

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 pupils

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.

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

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

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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 pupils 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 pupils, speak to the Headteacher. If the concerns/allegations are about the Headteacher, speak to the chair of governors.

Schools and colleges should follow their safeguarding procedures and policies including informing LADO.

Schools must work with other agencies to investigate when a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or pupils in a way that indicates he or she may
- pose a risk of harm to pupils;
- and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with pupils.

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 Headteacher (NOT to DSL, unless DSL is also the Headteacher).

Procedure for Dealing with Complaints and Allegations About the Headteacher

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

The Local Authority Designated Officers for Dudley are **Yvonne Nelson-Brown & Sukhchandan Kaur**.

Whistleblowing

(please refer to the Dudley LA Whistleblowing Policy for further information)

All staff, volunteers and parents at Roberts Primary School should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and such concerns will be taken seriously by our Headteacher, Governing Body and Senior Leadership Team. Our school has adopted the Dudley LA Whistleblowing Policy and appropriate whistleblowing procedures, (which are suitably reflected in staff training and staff behaviour policies,) are in place for such concerns to be raised with our Headteacher, Governing Body or senior leadership team.

Where a staff member feels unable to raise an issue with our Headteacher, Governing Body or senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, for example:

The NSPCC whistleblowing helpline – What you can do to report abuse is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Safeguarding in the Curriculum

Opportunities to Teach Safeguarding

At Roberts Primary School we ensure that children are taught about how to keep themselves and others safe, including online. At Roberts Primary 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).

Parents and carers can access the Roberts' curriculum at: <https://www.robertsprimary.org.uk/>

Child safety issues and child protection will be addressed through the curriculum where appropriate, especially through Personal Social Health Education (PSHE), Computing and Online Safety, Citizenship, Relationship and Sex Education (RSE,) Health Education and British values.

We use a variety of resources and approaches to teach the pupils how to keep themselves safe, build their resilience and manage risks.

The curriculum, in particular, the PSHE development strand of the curriculum, includes an emphasis on relationships (RSE), building confidence and resilience in pupils and in developing preventative strategies to ensure their own protection and that of others. Opportunities are provided for pupils to develop the skills and strategies they need to stay safe from abuse, including age appropriate discussions about healthy relationships, their bodies and being able to say no to requests that they do not want to carry out. Clear advice and guidance are built into the curriculum to ensure that pupils understand that there is a range of contacts they can turn to for advice and support and that they know where and how to report abuse.

Our school teaches the pupils how to keep themselves safe through:

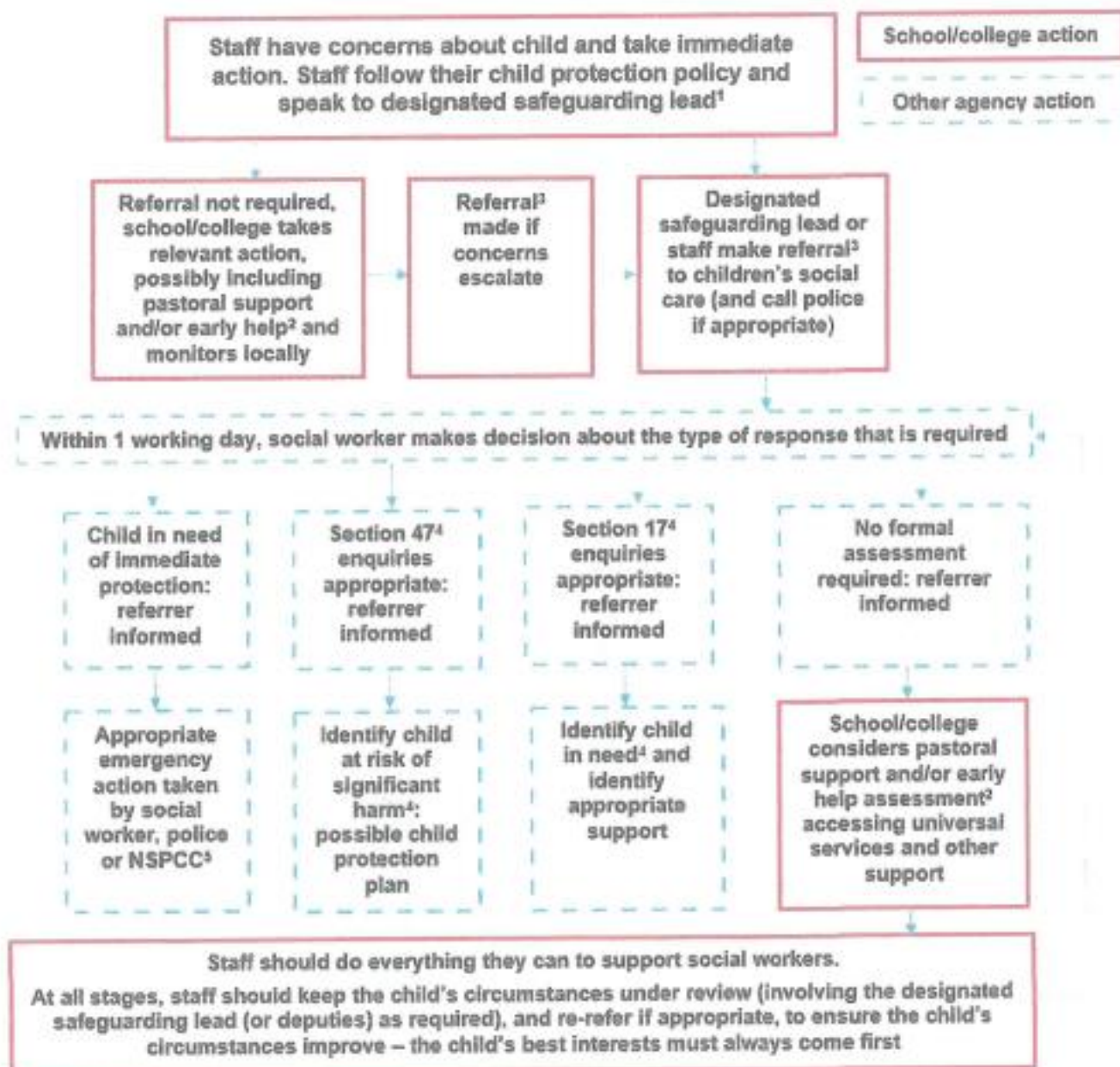
- Swimming lessons
- Educational Visits including adventurous activities
- PCSO – Talks on Bullying, Cyber-bullying, Stranger Danger, Firework and Park Safety
- People Who Help Us Topics
- PSHE/ Assemblies
- RSE and Health Education
- School Nurses
- British Values/ Virtues and Values
- NSPCC assemblies and workshops

Through the school's curriculum the pupils have the opportunity to go on school visits to enhance their learning. All off site visits are recorded and approved electronically. Parent/carer permission slips and medical forms are collected and kept in the office and the lead member of staff. Risk assessments are completed and filed within the electronic approval system "Evolve".

Complaints Procedure

Roberts Primary School follows Dudley Local Authorities' complaints procedure. A copy of this can be found on the school website.

Actions where there are concerns about a child



Low Level Concerns

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a Low-Level Concern?

The term 'low-level' concern **does not mean that it is insignificant**. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

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

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

- being over friendly with pupils;
- having favourites;
- taking photographs of pupils on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- or,
- using inappropriate sexualised, intimidating or offensive language.

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

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.