Overley Hall School

Child Protection and Safeguarding Policy 2026/2027

Commitment to review

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on yearly basis by a named person responsible below, who shall be accountable for that action. This policy will also be updated to reflect any statutory changes arising from future safeguarding legislation and statutory guidance.

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1.0 Our safeguarding team		
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Support and Scrutiny Safeguarding Lead	Liz Hyner lizhyner@overleyhall.com	
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Deputy Designated Safeguarding Lead	Mandy Peever	

2.0 Our safeguarding approach

2.1 Safeguarding Context

2.2 Overley Hall School is an independent special school providing education for up to 24 learners aged between 8 and 19 years. The school supports learners with a wide range of complex needs, including learning difficulties, autism, communication and social difficulties, and other associated diagnoses. A number of our learners also present with additional needs arising from experiences of attachment difficulties and trauma. Safeguarding practice at Overley Hall is underpinned by trauma-informed and attachment-aware principles. Staff recognise that past experiences may influence how learners communicate distress, form relationships and respond to risk.

2.3 Our safeguarding context is shaped by the individual needs and vulnerabilities of the learners we support. We recognise that all children and young people, regardless of ability or background, may be vulnerable to abuse, neglect, exploitation and other safeguarding risks. However, the vulnerability of our learners can be increased by factors such as cognitive differences, limited or impaired communication, difficulties understanding social situations, and challenges in recognising or communicating when something is wrong. Some learners may also have difficulty understanding risk, identifying inappropriate behaviour or seeking help from trusted adults. Many learners may be looked after, previously looked after or living within residential care arrangements. We recognise the additional safeguarding vulnerabilities that can arise for these learners and the importance of stable relationships, advocacy and effective multi-agency support.

2.4 Overley Hall School has a particularly close relationship with residential care. Many of our learners reside onsite at Wellingtonia Children's Home under Section 17, Section 20 or 31 arrangements, with placements varying between 39 and 52 weeks. Others attend the school as education-only day placements. This means that education, residential staff, parents and carers work closely together to ensure that learners, receive consistent care, support and safeguarding oversight across both settings.

2.5 The school currently supports learners from more than 14 different local authorities across the UK. This means that staff need to be mindful of the differing circumstances, care arrangements, backgrounds and safeguarding plans that may apply to individual learners.

2.6 The complexity of our cohort means that safeguarding at Overley Hall must be highly individualised and rooted in a strong understanding of each learner. Staff need to be familiar with learners' individual communication styles, behaviours, vulnerabilities, known risks, care arrangements and safeguarding plans. Changes in behaviour, presentation, communication or emotional wellbeing may be significant indicators of concern, particularly for learners who may be unable to communicate their experiences directly.

2.7 Our curriculum also has an important role in safeguarding. Through the curriculum, learners are supported to develop their understanding of relationships, personal safety, emotional wellbeing, healthy boundaries, online safety, consent, independence and recognising and responding to risk. Teaching is adapted carefully to meet individual cognitive, communication and developmental needs, ensuring that learners are given meaningful opportunities to develop the knowledge and skills they need to keep themselves safe.

2.8 Safeguarding is therefore embedded throughout the life of Overley Hall School rather than being viewed as a standalone responsibility. All staff have a responsibility to create an environment in which learners feel safe, respected, listened to and able to communicate their worries. Staff are expected to remain professionally curious, recognise changes or indicators of concern, follow the school's safeguarding procedures and report concerns promptly to the Designated Safeguarding Lead or Deputy Safeguarding Leads or in accordance with the school's escalation procedures.

2.9 Given the complexity and vulnerability of our learners, effective safeguarding also relies on strong partnership working between the school, Wellingtonia Children’s Home, parents and carers, placing local authorities, social care, health professionals and other relevant agencies. Information sharing, communication and a clear understanding of professional responsibilities are essential in ensuring that concerns are identified early and that appropriate action is taken.

2.10 At Overley Hall School, our safeguarding approach is therefore centred on knowing our learners well, understanding their individual vulnerabilities, listening to their voices and ensuring that every learner is supported to be as safe, confident and independent as possible.

3.0 Local Safeguarding Context: Telford & Wrekin and Shropshire

3.1 Whilst Overley Hall School supports learners from a wide range of local authority areas across the UK, we recognise that safeguarding risks are also influenced by the local context of Telford & Wrekin and neighbouring Shropshire communities, including Wellington and Shrewsbury. Staff remain alert to the vulnerabilities and safeguarding concerns that may affect children both within school and the wider community.

3.2 Local safeguarding partners identify child sexual exploitation (CSE), child criminal exploitation (CCE), county lines activity, serious violence, weapon carrying, domestic abuse, neglect, mental health concerns, online harm, substance misuse, attendance vulnerabilities and radicalisation as significant safeguarding priorities. Children and young people may be vulnerable to harm through peer groups, online environments, community locations, organised criminal activity and other extra-familial contexts. Safeguarding responses at Overley Hall therefore consider the wider context of a learner's life, recognising that harm can occur both within and beyond the home, school or residential environment. [gov.uk]

3.3 The legacy of the Independent Inquiry into Child Sexual Exploitation in Telford continues to influence local safeguarding practice. As a result, there remains a strong focus across partner agencies on the identification, prevention and disruption of exploitation, ensuring that vulnerable children are recognised, listened to, supported and protected at the earliest opportunity.

3.4 Given the complexity and vulnerability of our learner cohort, we recognise that some learners may face additional barriers to recognising, understanding or communicating safeguarding concerns. Staff therefore maintain a particular awareness of indicators of exploitation, abuse, neglect, coercion, online harm, child-on-child abuse, serious violence and contextual safeguarding concerns. We recognise that these risks may present differently in learners with special educational needs and disabilities and that changes in behaviour, communication, engagement, emotional presentation or wellbeing may indicate that additional support or intervention is required. [assets.pub...ice.gov.uk], [gov.uk]

3.5 In line with Keeping Children Safe in Education and Working Together to Safeguard Children, all staff consider local, contextual and emerging safeguarding risks when assessing need, identifying concerns and determining appropriate early help, child

protection and multi-agency responses. Safeguarding practice at Overley Hall is child-centred, trauma-informed and rooted in a strong understanding of each learner's individual needs, vulnerabilities and lived experiences

4.0 Safeguarding Intent

4.1 At Overley Hall School, safeguarding is at the heart of everything we do. Our intent is to create and sustain a strong culture of safety in which every learner is known, valued, listened to and protected. We recognise that all children and young people are vulnerable to safeguarding risks; however, the complexity of our cohort means that many of our learners may be particularly vulnerable due to learning difficulties, autism, communication and social difficulties, cognitive differences, attachment and trauma, and difficulties in recognising, understanding or communicating risk. We also recognise that attendance, absence and engagement may be important indicators of welfare concerns and will actively monitor and respond to emerging patterns.

4.2 The Proprietor, Support and Scrutiny Board and school leaders fulfil their safeguarding responsibilities in accordance with the Independent School Standards, KCSIE, Working Together to Safeguard Children and other relevant regulatory requirements.

4.3 Our safeguarding intent is therefore to ensure that every learner is supported to feel safe, understand risk to the best of their ability, develop their voice and communication, recognise when something is not right, and know how to seek help from a trusted adult. We aim to reduce vulnerability through strong relationships, highly individualised support, effective communication and a curriculum that explicitly teaches learners how to keep themselves safe.

4.4 We will achieve this by:

- Creating a strong culture of safeguarding and safety, in which safeguarding is everyone's responsibility and is embedded throughout school life, our curriculum, policies, practice and relationships.
- Putting the learner at the centre of safeguarding, recognising their individual needs, communication style, experiences, vulnerabilities, strengths and aspirations. We will ensure that every learner has a voice, whether through speech, signs, symbols, pictures, technology or other individual means of communication.

- Developing learners' understanding of safety and risk through our curriculum and pedagogical approach. This includes developing communication, emotional literacy, problem-solving, decision-making, understanding feelings and emotions, expressing likes and dislikes, developing appropriate relationships and boundaries, understanding right and wrong, and knowing how and when to ask for help.
- Recognising and responding to the specific vulnerabilities within our cohort, including the potential impact of attachment and trauma, social and communication difficulties, neglect, domestic abuse, exploitation, child-on-child abuse, bullying, online risks, emotional and mental health difficulties and other forms of abuse. We recognise that child-on-child abuse can happen in any setting and will actively promote respectful relationships, appropriate boundaries and safe behaviour.
- Promoting emotional health and wellbeing, creating an environment where learners feel secure, understood and able to talk about their feelings and concerns. We will provide appropriate opportunities for reflection, regulation and support, recognising that changes in behaviour or presentation may be a learner's way of communicating that something is wrong.
- Providing early help at the right time, working proactively with learners, families, carers, social workers, local authorities, health professionals and other agencies. We will share information appropriately and work in partnership to ensure that learners receive the right support at the right time.
- Maintaining an open and welcoming school, with positive relationships between school, families, carers, advocates and professionals. Through our Open Door approach, we seek to strengthen communication and ensure that those who know the learner best can contribute to safeguarding and, where appropriate, act as an important voice for the child.
- Maintaining high levels of professional curiosity and vigilance, recognising that safeguarding concerns can arise at any time and may present differently for learners with complex communication or cognitive needs. We will listen carefully, take concerns seriously, record and report them appropriately, and never assume that a change in behaviour is simply part of a learner's diagnosis or presentation.
- Keeping learners safe online, through secure and appropriately managed internet provision and a curriculum that develops safe and responsible digital behaviours. We will recognise the additional risks that online communication and social media may present to vulnerable learners and support them to understand these risks.

- Creating an inclusive environment, free from discrimination, harassment, bullying and intolerance. We will promote dignity, respect, equality and positive relationships and ensure that our Behaviour and Anti-Bullying approaches contribute actively to safeguarding.
- Ensuring strong safeguarding leadership and accountability, with leaders demonstrating an absolute commitment to safeguarding and ensuring that appropriate resources, systems, training and expertise are available. Clear child protection procedures will be maintained, understood and regularly reviewed.
- Ensuring safer recruitment and professional practice, including appropriate vetting, recruitment, induction, safeguarding training, supervision and ongoing professional development for all staff. Staff will be supported to understand both their safeguarding responsibilities and the particular vulnerabilities of our learners.
- Promoting staff wellbeing and reflective practice, recognising that working with learners with complex needs can be challenging. We will provide appropriate opportunities for supervision, debriefing and reflection so that staff remain supported, resilient and professionally curious.
- Maintaining safe environments and practices, including appropriate health and safety procedures, visitor management, site security and safe working practices across the school and residential environment.
- Monitoring, recording and responding to concerns, including concerns relating to neglect, abuse, exploitation, domestic abuse, emotional wellbeing, online safety, attendance, missing episodes and child-on-child abuse. We will ensure that concerns are appropriately escalated and that professional responsibilities are clearly understood.
- Working in partnership with Wellingtonia Children's Home, recognising the close relationship between education and residential care for the majority of our learners. Effective communication and information sharing between the school and residential provision are essential to maintaining a consistent and holistic safeguarding response.
- Evaluating and reviewing our safeguarding practice, through a rolling programme of monitoring, evaluation, training, policy review and reflection. We will use safeguarding information, emerging local and national risks, incidents, professional learning and the individual needs of our cohort to continually strengthen our practice.

4.5 Our overarching aim

4.6 Our ultimate aim is to ensure that every learner at Overley Hall is as safe, confident and independent as possible. We want our learners to develop the knowledge, communication, emotional understanding and practical skills they need to recognise risk, build safe relationships, make informed choices and seek help when they need it.

4.7 We will work collaboratively with families, carers, social workers, local authorities and other professionals to provide the right help, at the right time, for every learner, while maintaining a safeguarding culture in which no concern is ignored, every voice is valued and every learner is treated with dignity, respect and compassion.

4.8 Safeguarding Implementation

4.9 At Overley Hall School, our safeguarding intent is implemented through a whole-school, learner-centred approach in which safeguarding is embedded in our daily practice, curriculum, relationships and decision-making. Given the complexity and vulnerability of our learners, our approach is highly individualised, proactive and responsive. We recognise that safeguarding concerns may be communicated through behaviour, changes in presentation, attendance, communication or emotional wellbeing, rather than through a direct disclosure.

4.10 Our implementation is led by the Head Teacher, Designated Safeguarding Lead and Senior Leadership Team and is understood as the responsibility of every member of staff.

4.11 Creating and maintaining a strong safeguarding culture

4.12 Safeguarding is a standing priority within school leadership and is regularly reinforced through staff meetings, briefings, supervision, training and day-to-day practice. Leaders model professional curiosity and ensure that safeguarding remains central to decision-making.

4.13 All staff receive safeguarding training at least annually, with additional updates provided throughout the year in response to emerging risks, changes in legislation and guidance, local intelligence, individual learner needs and learning from incidents. A central record of safeguarding training is maintained to ensure compliance and identify any training needs.

4.14 Staff are expected to know their learners well and to recognise that safeguarding concerns may present differently for learners with SEND. We encourage staff to report concerns promptly and maintain a culture in which no concern is considered too small to share.

4.15 Individualised safeguarding and knowing the learner

4.16 Our safeguarding practice is informed by detailed knowledge of each learner's needs, vulnerabilities, communication methods, relationships and behaviours.

4.17 Positive Support Plans are developed and regularly reviewed to reflect individual needs and changes in presentation. These plans support staff to understand learners' behaviour, communication and emotional needs and to respond consistently and appropriately.

4.18 We monitor behaviour, attendance, wellbeing and engagement so that changes can be identified at an early stage. Where concerns arise, Meetings Around the Child (MAC) can be convened to bring together the relevant professionals and ensure that the learner receives the right support at the right time.

4.19 Our multidisciplinary approach includes access to therapists and therapy assistants, who contribute to understanding and addressing learners' communication, emotional, sensory and developmental needs.

4.20 Removing barriers to communication and disclosure

4.21 A key feature of safeguarding at Overley Hall is recognising that some learners may not be able to communicate a concern using conventional speech.

4.22 We therefore use and develop Augmentative and Alternative Communication (AAC) approaches for learners who may benefit from them. This can include symbols, pictures, signs, communication technology and other individualised methods.

4.23 Staff are trained to understand learners' individual communication styles and are encouraged to recognise changes in behaviour or presentation as potential forms of communication. Learners are given regular opportunities to express their feelings, preferences, worries and experiences in ways that are meaningful to them.

4.24 Our curriculum explicitly develops learners' ability to communicate their needs, understand emotions, recognise safe and unsafe situations and identify trusted adults who can help them.

4.25 Safeguarding through the curriculum

4.26 Our curriculum is a key vehicle for preventing safeguarding concerns and developing learners' resilience, independence and ability to keep themselves safe.

4.27 The curriculum is data-informed, individualised and responsive to the needs and vulnerabilities of our cohort. Assessment information, learner profiles, behaviour, attendance, incidents, safeguarding concerns and professional advice are used to identify areas requiring additional teaching or intervention.

4.28 Our RSHE provision and wider curriculum address areas including, where cognitively appropriate, relationships, health, wellbeing, personal safety, and preparation for adulthood:

- healthy and respectful relationships;
- friendships and appropriate boundaries;
- recognising safe and unsafe behaviour;
- consent and personal space;
- understanding feelings and emotional wellbeing;
- recognising and communicating worries;
- bullying and child-on-child abuse;
- online safety and responsible digital behaviour;
- LGBTQ+ awareness and inclusion;
- exploitation and appropriate help-seeking;
- understanding risk and making safer choices;
- knowing who to talk to when something feels wrong.

4.29 Specific Focus Days, including Online Safety, Friendship and LGBTQ+ days, provide additional opportunities to explore safeguarding themes in an accessible and engaging way.

4.30 Teaching is adapted to the cognitive, communication and developmental needs of individual learners. Concepts are revisited regularly and taught through appropriate methods, including practical experiences, visual resources, modelling, role play, social stories and AAC where appropriate.

4.31 Preventing and responding to child-on-child abuse

4.32 We recognise that child-on-child abuse can happen in any setting, including specialist provision, and we do not make assumptions that learners' additional needs prevent such behaviour from occurring.

4.33 We actively teach learners about respectful relationships, personal boundaries, consent, appropriate behaviour and how to seek help. Staff remain vigilant to behaviours that may indicate bullying, harassment, sexualised behaviour, intimidation, exploitation or other forms of harmful behaviour between learners.

4.34 All concerns are taken seriously, recorded and responded to in accordance with the school's safeguarding, behaviour and anti-bullying procedures. Responses are individualised and take account of the needs, communication abilities, developmental level and understanding of all learners involved.

4.35 Where appropriate, additional support, supervision, therapeutic input, curriculum intervention and Positive Support Plans are used to reduce risk and prevent recurrence.

4.36 Online safety

4.37 Online safety is embedded within the curriculum and reinforced through specific teaching and Focus Days.

4.38 The school maintains a secure and appropriately managed internet provision, supported by a professional company specialising in online safety and internet filtering. Learners are taught how to use technology safely and responsibly, including understanding online relationships, appropriate communication, privacy, personal information, inappropriate content and how to report concerns.

4.39 Online safety is considered particularly important for our learners because communication and social interaction online may present additional risks for young people with social communication difficulties or limited understanding of risk.

4.40 Attendance, behaviour and early identification

4.41 Attendance and behaviour are actively monitored as part of our safeguarding arrangements. Changes in attendance, engagement, behaviour, presentation or relationships may provide important indicators that a learner is experiencing difficulty or that a safeguarding concern requires further exploration.

4.42 Where concerns emerge, these are considered alongside the learner's wider circumstances rather than in isolation. Appropriate professionals are involved and Meetings Around the Child are used where necessary to coordinate support.

4.43 For residential and education-only learners, effective communication between education and residential staff is particularly important in identifying changes and ensuring that concerns are understood across both environments.

4.44 Partnership working and family help

4.45 We work closely with parents, carers, advocates, social workers, placing local authorities, Wellingtonia Children's Home and other relevant professionals.

4.46 Individual social workers are contacted and consulted as appropriate, and information is shared in accordance with safeguarding requirements. Our approach aims to ensure that learners and families receive the right help at the right time, including early help where this is appropriate.

4.47 Our open and welcoming approach encourages families, carers and professionals to share information and concerns. We recognise that those who know the learner well may provide important information that helps us to understand changes in presentation or behaviour.

4.48 Safer staff and professional practice

4.49 Safeguarding begins with ensuring that the adults working with our learners are suitable, knowledgeable and supported.

4.50 The school maintains robust safer recruitment, vetting, induction and training arrangements. Staff receive safeguarding information as part of their induction and are expected to understand the school's safeguarding procedures, reporting arrangements and professional boundaries.

4.51 Safeguarding supervision, reflective practice and appropriate debriefing are used to support staff working with complex and sometimes challenging situations. Staff wellbeing is recognised as an important part of maintaining effective safeguarding practice. We promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities. All of our systems, processes and policies operate with the best interests of the child at their heart.

4.52 Monitoring, evaluation and continual improvement

4.53 Safeguarding effectiveness is monitored through a combination of leadership oversight, safeguarding records, training records, behaviour and attendance information, incident monitoring, learner voice, staff feedback, policy review and professional reflection.

4.54 The school maintains a rolling programme of safeguarding evaluation and review to ensure that policies and procedures remain effective and responsive to the changing needs of our learners.

4.55 Leaders consider emerging national and local safeguarding priorities alongside the specific risks and vulnerabilities identified within our cohort. This ensures that safeguarding is not simply a compliance exercise but an evolving process of identifying risk, learning from experience and improving practice.

4.56 Our implementation in practice

4.57 The implementation of safeguarding at Overley Hall can therefore be summarised as:

4.58 Know the learner → identify vulnerability → remove barriers to communication → teach the learner how to stay safe → monitor and recognise change → respond early → work in partnership → review and adapt.

4.59 Through this approach, safeguarding becomes part of the everyday experience of learners rather than a separate process. Our aim is to create an environment in which learners are safe, listened to, understood and supported to develop the skills and confidence to protect themselves and seek help when they need it.

4.60 Safeguarding Impact

4.61 The impact of our safeguarding intent and implementation will be evident in the culture, relationships, behaviours and outcomes across Overley Hall School. We will know that our approach is effective when safeguarding is embedded in everyday practice, when staff demonstrate professional curiosity and confidence, and when learners are increasingly able to communicate their needs, recognise risk and seek help.

4.62 Our measure of success is not simply the absence of safeguarding incidents. Effective safeguarding means that concerns are identified early, responded to appropriately and used as opportunities to learn and improve practice. We expect our safeguarding culture to continually evolve in response to the needs of our learners, emerging risks and the experiences of our whole school community.

4.63 What will we see?

4.64 If our safeguarding intent and implementation are effective, we will see:

- A strong culture of professional curiosity, with staff consistently looking, listening and questioning changes in behaviour, presentation, communication, attendance and emotional wellbeing.
- Staff who are confident, vigilant and well trained, able to recognise safeguarding concerns and translate their training into effective practice.
- A staff team that feels supported, valued and listened to, with resilient leadership that promotes an open, transparent and solution-focused safeguarding culture.
- Learners who feel safe, respected and listened to, and who understand that their views, feelings and concerns are taken seriously.
- Learners communicating through their preferred and most effective communication methods, including speech, AAC, symbols, signs, technology and other individualised approaches.

- Learners regularly communicating how they feel through Modes of Regulation and other appropriate systems, enabling staff to identify changes in emotional wellbeing at an early stage.
- An individualised and inclusive curriculum that responds to identified safeguarding risks and enables learners to develop practical skills in communication, relationships, emotional regulation, online safety, decision-making and help-seeking.
- Learners demonstrating increasing understanding of safe and unsafe situations, appropriate relationships, personal boundaries and how to seek help.
- Learners using the internet safely and, where appropriate, being able to explain why online safety is important.
- Positive Support Plans that are informed by current evidence, regularly reviewed and adapted following incidents, debriefs, changes in behaviour and emerging needs.
- A reduction in repeated incidents and vulnerabilities through early intervention, effective planning and targeted support, while recognising that incidents will inevitably occur within a complex specialist setting.
- A culture in which concerns, including child-on-child abuse, bullying, neglect, exploitation and online safety concerns, are identified, recorded, reported and acted upon appropriately.
- Visitors being appropriately signed in, monitored, escorted and supervised in accordance with school procedures.
- A complete and regularly monitored Single Central Register, providing assurance that safer recruitment and vetting requirements are being met.
- Effective communication between education, residential care, families, social workers, local authorities and other professionals, ensuring that safeguarding information is shared appropriately and that learners receive the right support at the right time.

4.65 Monitoring by the DSL, DDSL and leaders

4.66 The Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSL) will maintain ongoing oversight of safeguarding through:

- regular review of safeguarding concerns, referrals, chronologies and actions;

- monitoring patterns and trends in safeguarding incidents;
- reviewing behaviour, attendance, regulation and wellbeing data;
- monitoring concerns relating to child-on-child abuse, bullying, neglect, exploitation and online safety;
- reviewing learners who demonstrate increased dysregulation or changes in presentation;
- ensuring that appropriate Meetings Around the Child (MAC) are convened when required;
- checking that actions arising from safeguarding concerns are followed through and reviewed;
- monitoring the effectiveness and currency of Positive Support Plans;
- reviewing safeguarding training, staff induction and staff knowledge;
- monitoring the Single Central Register and safer recruitment arrangements;
- reviewing the management and supervision of visitors;
- undertaking safeguarding audits and policy reviews;
- gathering learner, parent, carer and staff feedback;
- identifying emerging safeguarding risks and ensuring that curriculum provision responds appropriately;
- reviewing incidents and debriefs to identify learning and required changes to practice.

4.67 Safeguarding information will be considered analytically rather than simply recorded. Leaders will look for patterns, recurring themes and changes over time and will use this information to determine whether additional intervention, training, curriculum provision or partnership working is required.

4.68 Learning from behaviours and behaviour analysis and professional reflection

4.69 At Overley Hall, incidents are viewed as opportunities to strengthen practice. Following significant or challenging incidents, staff will undertake appropriate debriefing and reflection. Learning from these discussions will inform Positive Support Plans, risk assessments, staff practice and, where appropriate, curriculum planning.

4.70 We will ask:

4.71 What happened? Why might it have happened? What did we learn? What needs to change?

4.72 This reflective approach ensures that safeguarding is continually improving rather than remaining static.

4.73 Governance and external assurance

4.74 The Support and Scrutiny Board will provide challenge and oversight of safeguarding and will be furnished with relevant safeguarding information and data, including trends in behavioural incidents, MAC meetings, attendance and other appropriate safeguarding indicators.

4.75 Governance will seek assurance through:

- regular safeguarding reports and data presented by school leaders;
- scrutiny of safeguarding policies, procedures and actions;
- monitoring of safeguarding training and safer recruitment arrangements;
- visits to the school to observe practice and speak directly with staff and, where appropriate, learners;
- consideration of safeguarding trends and emerging risks;
- reviewing the effectiveness of leadership oversight;
- seeking evidence that safeguarding concerns are identified, acted upon and followed through;
- consideration of external professional advice, audits, inspections and recommendations;
- ensuring that identified actions are monitored to completion.

4.76 External assurance will also be sought through appropriate professional networks, local authority relationships, safeguarding professionals and other relevant agencies. Any recommendations or findings will be incorporated into our safeguarding improvement cycle.

4.77 Learner voice

4.78 Learner voice is central to our safeguarding approach. We recognise that some learners may not be able to communicate their views through conventional speech and

therefore use a range of approaches to ensure that every learner has an opportunity to be heard.

4.79 Learner voice will be gathered through:

- individual conversations;
- AAC and communication systems;
- symbols, pictures and signs;
- Zones of Regulation;
- observations of behaviour and communication;
- curriculum activities and RSHE;
- learner questionnaires where appropriate;
- learner voice activities;
- Focus Days and targeted safeguarding discussions;
- feedback following incidents or significant events, where appropriate.

4.80 We will not rely solely on what a learner tells us verbally. What learners communicate through their behaviour, choices, interactions and presentation will also be considered.

4.81 The impact of learner voice will be evident when learners can demonstrate that they know who they can talk to, how to communicate a worry and that adults will listen and respond.

4.82 Parent, carer and professional voice

4.83 Parents, carers, advocates and professionals will be encouraged to provide feedback through regular communication, meetings, reviews and appropriate questionnaires or surveys.

4.84 Their views will help us to understand whether safeguarding arrangements are consistent across settings and whether communication between school, home, residential care and external professionals is effective.

4.85 Feedback will be reviewed by leaders and used to identify strengths, concerns and areas for development.

4.86 The ultimate impact

4.87 The ultimate impact of our safeguarding approach will be that learners at Overley Hall are safer, more confident and increasingly able to advocate for themselves.

4.88 We want to see learners who:

4.89 Feel safe → communicate their needs → understand risk → develop safe relationships → know how to seek help → are listened to → receive the right support at the right time.

4.90 For staff, the impact will be a culture of confidence, professional curiosity, openness, accountability and continuous improvement.

4.91 For families and professionals, the impact will be confidence that Overley Hall listens, responds, communicates effectively and places the safety and wellbeing of every learner at the centre of its work.

4.92 Our safeguarding impact will therefore be demonstrated not only through compliance and monitoring, but through the lived experience of learners and the strength of the safeguarding culture throughout the Overley Hall community.

5.0 Summary & Aims

5.1 At Overley Hall School, we have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). This policy has been developed in line with legal obligations including, where applicable, the Human Rights Act 1998, the European Convention on Human Rights, the Domestic Abuse Act 2021, the Children and Social Work Act 2017, the Equality Act 2010 and Public Sector Equality Duty, the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

5.2 This policy is aligned with the statutory guidance *Keeping Children Safe in Education (KCSIE) 2026*, *Working Together to Safeguard Children 2026*, and paragraphs 7(a) and (b) of the Independent School Standards.

5.3 This policy reflects the latest definitions, expectations and safeguarding responsibilities for all staff, volunteers, governors, trustees and proprietors within educational settings.

5.4 We will also follow the DfE's *What to do if you are Worried a Child is Being Abused: Advice for Practitioners*. We recognise that the NSPCC website provides additional information on abuse, neglect, exploitation and indicators of harm.

5.5 All child protection matters will be dealt with in line with the arrangements of the Telford and Wrekin Safeguarding Partnership (TWSP) and the West Midlands Child Protection and Safeguarding Procedures or, where relevant, the safeguarding partnership area in which a child resides or for which another local authority holds responsibility.

5.6 We are committed to maintaining an open and positive safeguarding culture where learners feel that they belong, are valued, are kept safe and are able to thrive. We regularly evaluate the effectiveness of our safeguarding arrangements through leadership oversight, governance scrutiny, safeguarding audits, learner voice, parent feedback, staff consultation and external review. This evaluation informs our safeguarding improvement planning and helps ensure that safeguarding remains effective, responsive and centred on the lived experience of children and young people.

5.7 This policy replaces the previous policy dated 5th September 2025.

5.8 We have a duty of care to all learners, their families and staff. The safety and protection of children and young people is of paramount importance. The aim of this policy is to ensure that everyone within our setting feels safe, that welfare is promoted, and that clear roles and responsibilities are understood and implemented. We are committed to effective multi-agency working to keep children safe. Our setting provides a caring, positive, safe and stimulating environment that promotes the social, physical, emotional and moral development of each learner. We actively promote an inclusive and anti-discriminatory culture in which racism, prejudice and all forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities. All of our systems, processes and policies operate with the best interests of the child at their heart.

5.9 The Support and Scrutiny Team (SAS), Proprietor and Board will ensure that all adults working or volunteering within the setting have read and understand Part One of *Keeping Children Safe in Education 2026* and are aware of the requirements of *Working Together to Safeguard Children 2026*.

5.10 All members of the Support and Scrutiny Team (SAS), the Proprietor, the Board, the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads

will read and understand the full *Keeping Children Safe in Education 2026* guidance and the relevant sections of *Working Together to Safeguard Children 2026*.

5.11 The Support and Scrutiny Team (SAS), Proprietor and Board will ensure that an appropriate member of the senior leadership team is appointed as Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL will be provided with sufficient time, funding, training, resources and support to carry out the role effectively.

5.12 Appropriate arrangements will be in place to ensure safeguarding leadership and decision-making continue when the DSL is unavailable due to absence, leave or other circumstances. These arrangements will be communicated to all staff.

5.13 The Support and Scrutiny Team (SAS), Proprietor and Board will ensure that mechanisms are in place to assist staff in understanding and discharging their safeguarding responsibilities as set out in Part One of *Keeping Children Safe in Education 2026*.

5.14 Our safeguarding policy and all supplementary safeguarding policies and procedures are published on our website and available to all stakeholders. This policy reflects the changes outlined in Annex F of *Keeping Children Safe in Education 2026*. It will be reviewed annually, or sooner if required, and updated in response to any changes in legislation, statutory guidance or local safeguarding arrangements.

6.0 Part one: Safeguarding information:

A child-centred and coordinated approach to safeguarding

6.1 All those who are part of our school, including our staff are an important part of the wider safeguarding system for our learners.

6.2 All staff are aware of the requirements of KCSIE 2026 and have regard to the requirements set out in KCSIE and Working Together to Safeguard Children.

6.3 Its everyone's responsibility to safeguard and promote the welfare of children. This responsibility applies to all staff, proprietor and anyone who comes into contact with children and their families. Everyone will consider, at all times, what is in the best interests of the child and ensure their practice is child-centred.

6.4 No one will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action to help children and families receive the right help at the right time.

6.5 We recognise that safeguarding is wider than child protection and includes protecting children from abuse, neglect, exploitation, online harms, child-on-child abuse, serious violence, radicalisation, mental health concerns where these are linked to safeguarding, and other risks that may arise both within and beyond the school environment. For the purpose of this policy, safeguarding and promoting the welfare of children is defined 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; and
- Taking action to enable all children to have the best outcomes.

6.6 'Children' includes everyone under the age of 18.

6.7 The role of our staff

6.8 Our staff will identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. They will provide a safe environment in which children can learn.

6.9 We are committed to identifying children who may benefit from family help. Family help means providing support as soon as a problem emerges at any point in a child's life, from foundation years through to teenage years.

6.10 The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads provide advice and support on safeguarding concerns, support staff to carry out their safeguarding responsibilities, coordinate safeguarding activity within the school and liaise closely with children's social care and other relevant agencies. All staff are expected to support children's social care and other agencies following any referral made to them.

6.11 All teachers, including the Headteacher in accordance with the Teachers' Standards 2012 will safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties.

6.12 Staff training and induction

6.13 All staff will receive an induction, so they are aware of our safeguarding systems. This will include the child protection policy, child-on-child abuse policy and procedures, behaviour policy, staff behaviour policy, safeguarding response to children who are absent from education and role of the DSL and CSE lead (including the identity of the DSL and any deputies). We will provide copies of policies and a copy of Part one or all of KCSIE 2026 to all staff at induction. We will maintain a record of training and policies provided to new staff during their induction.

6.14 Staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will be refreshed every three years. All staff will also receive at least annual child protection and safeguarding updates (including online safety), to provide them with relevant skills and knowledge to safeguard children effectively. All staff will receive annual training in child sexual exploitation awareness. We will ensure staff safeguarding training is integrated, aligned and considered as part of whole school safeguarding approach and wider staff training and curriculum planning and training helps staff to understand local safeguarding procedures. We will maintain a record of training.

6.15 All staff will be made aware of Telford and Wrekin process for community-based Family Help assessments, the criteria, including the level of need, for when a case should be referred to Family Help support and services provided at: Targeted early help level (under sections 10 and 11 of the Children Act 2004), and Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children).

6.16 All staff are aware of the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child

is suffering or likely to suffer significant harm) including cases relating to the abuse, neglect, and exploitation of children

6.17 All staff will be made aware of the following:

- What to do if a child tells them he/she is being abused, exploited or neglected;
- How to reassure victims they are being taken seriously and that they will be supported and kept safe;
- That children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful;
- Staff should be professionally curious and speak to the DSL or their deputies if they have concerns about a child, and
- Staff should build trusted relationships with children which facilitate communication.

6.18 We will encourage staff to consider the TWSP briefing on professional curiosity. Records will be factual, timely, child-focused and stored securely in accordance with school safeguarding procedures and data protection requirements.

6.19 Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and children's social care. Staff will never promise a child that they will not tell anyone about a report of any form of abuse, neglect and/or exploitation because this may ultimately not be in the best interests of the child. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. Staff will record how they have reassured victims.

6.20 Family Help

6.21 Our Family Help offer is aligned with the principles and expectations set out in *Working Together to Safeguard Children 2026*, ensuring that children, young people and their families receive the right support at the right time. We use the Telford & Wrekin Pathway to Support Guidance to inform decision-making and work

collaboratively with partner agencies to deliver coordinated support through the Family First Partnership (FFP) programme.

6.22 We recognise that any child may benefit from community-based or targeted Family Help, and all staff are expected to be alert to indicators that a child may require additional support. This may include children who:

- are disabled or have specific health conditions and additional needs;
- have special educational needs and disabilities (SEND), whether or not they have an Education, Health and Care Plan (EHCP);
- have mental health or emotional wellbeing needs;
- are young carers;
- are pregnant or are parents themselves;
- have displayed early signs of abusive, violent or harmful behaviour;
- are vulnerable to anti-social behaviour, criminal exploitation, gang involvement, organised crime or county lines activity;
- are missing, or at risk of missing, education, home or care;
- have experienced repeated removals from class, multiple suspensions, a part-time timetable, are at risk of permanent exclusion, or are educated in alternative provision;
- are at risk of exploitation, including criminal exploitation, sexual exploitation, modern slavery or trafficking;
- are vulnerable to radicalisation or extremism;
- have a parent or carer in custody, or are affected by parental offending;
- live in circumstances that present additional challenges, including domestic abuse, adult mental health difficulties, or substance misuse;
- misuse alcohol or drugs themselves;
- have returned home from care;
- are at risk of so-called honour-based abuse, including Female Genital Mutilation (FGM) or forced marriage;
- are privately fostered; or
- are persistently absent from education, including where absences occur for part of the school day.

6.23 Where concerns are identified, staff will work with the Designated Safeguarding Lead (DSL) or deputies,

6.24 to consider appropriate support, including Family Help assessments, multi-agency working and referrals to relevant services where required.

6.34 We ensure that any child or young person who discloses that they have taken an overdose, whether intentional or accidental, receives immediate medical assessment through the nearest Emergency Department in accordance with the Telford & Wrekin Safeguarding Partnership (TWSP) Procedure for the Management of Overdoses Involving Children and Young People in Schools and Colleges.

6.35 Legislation defines a young carer as:

"A person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work)."

6.36 A young carer may provide support to a family member who is ill, disabled, has a long-term health condition, experiences mental health difficulties, or is affected by alcohol or substance misuse.

6.37 We recognise that the responsibilities undertaken by young carers can be extensive and may include:

- practical tasks such as cooking, cleaning, shopping and household management;
- physical support, including assisting someone with mobility;
- emotional support and reassurance;
- personal care and support with daily living activities;
- managing finances and collecting prescriptions;
- administering or assisting with medication;
- supporting communication; and
- caring for younger siblings.

6.38 We recognise that caring responsibilities can be isolating, stressful and emotionally demanding for children and young people. These responsibilities may impact attendance, engagement, wellbeing, educational progress and future opportunities. We are committed to working with families and partner agencies to identify young carers at the earliest

opportunity, ensure that their needs are understood and assessed, and provide appropriate support. Where appropriate, we will work closely with the Telford and Wrekin Young Carers Service and other relevant agencies to secure support for young carers and their families.

- Our Family Help offer is aligned with the expectations of Working Together to Safeguard Children 2026, ensuring that children and families receive the right support at the right time. We use the Telford & Wrekin Pathway to Support Guidance to inform our decisions and work collaboratively with partners to deliver integrated support through the Family First Partnership (FFP) programme. We believe that any child may benefit from community-based or targeted Family Help, and we ensure that all staff are alert to the potential need for early help for a child who: Is disabled or has certain health conditions and has specific additional needs;
- As special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- Has a mental health need
- Is a young carer;
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Is frequently missing/goes missing from education, home or care;
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school or college and / or is in Alternative Provision or a Learner Referral Unit;
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending;
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

- Is misusing drugs or alcohol themselves;
- Has returned home to their family from care;
- Is at risk of so-called ‘honour’-based abuse, such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child; and
- Is persistently absent from education, including persistent absences for part of the day.

6.39 We ensure that all children that disclose that they have taken an overdose go to the Emergency Department at the nearest hospital to be checked by a medical professional in line with the TWSP Procedure for the management of overdoses, involving children within schools and colleges.

6.40 Legislation defines a ‘young carer’ as ‘…a person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work).' A young carer might look after someone because they are sick or have a disability or mental health issues. Or, if a parent or family member has an alcohol or drug problem, they may be unable to care for themselves or anyone else.

6.41 We recognise the responsibilities of young carers are wide and varied but can include:

- practical tasks, such as cooking, housework and shopping;
- physical care, like helping someone out of bed;
- emotional support, including talking to someone who is distressed;
- personal care, such as helping someone dress;
- managing the family budget and collecting prescriptions;
- helping to give medicine;
- helping someone communicate, and
- looking after brothers and sisters.

6.42 Caring for someone can be very isolating, worrying and stressful for children. For young carers, this can negatively affect their experience in education. We recognise that many young carers will regularly miss school/college and that this can have a lasting effect on their life chances. Our aim is to work with families and other agencies to identify young carers to ensure that their needs are assessed and where necessary supported. We will work with the Telford and Wrekin Young Carers Service to do this.

6.43 Abuse, Neglect and Exploitation

6.44 All staff are trained to recognise the indicators of abuse, neglect, exploitation and modern slavery. Staff understand that children can be at risk of harm inside and outside the school, inside and outside the home, and online. Staff are expected to exercise professional curiosity and remain vigilant to emerging concerns, recognising that early identification of abuse, neglect or exploitation is essential to ensuring that children receive the help and protection they may need.

6.44 We recognise that abuse, neglect, exploitation and safeguarding concerns are rarely isolated events. All staff, and particularly the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads, will consider whether children may be at risk of abuse, exploitation or other harms in situations beyond their families. Extra-familial harm can take many forms, and children may be vulnerable to multiple and overlapping risks including, but not limited to:

- sexual abuse, harassment and exploitation;
- domestic abuse within their own intimate relationships, including teenage relationship abuse, stalking and coercive or controlling behaviour;
- criminal exploitation, including financial exploitation;
- serious violence and serious youth violence;
- county lines activity; and
- radicalisation and extremism.

6.45 All staff understand that technology is a significant factor in many safeguarding and wellbeing concerns. Children may be at risk of abuse and exploitation online as well as face to face. In many cases, abuse may occur simultaneously through online and offline channels.

6.46 All staff are aware that children can abuse other children online. This may include abusive, harassing, misogynistic or misandrist messages; online bullying; coercive or controlling behaviour; the non-consensual creation, sharing or distribution of nude and semi-nude images; the sharing of indecent images; and the sending of pornography or other abusive content to individuals who do not wish to receive it.

6.47 Abuse**:** Abuse is 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 the ill-treatment of others. This is particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family setting 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 one or more adults or by another child or children. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.

6.48 Physical Abuse**:** Physical abuse is a form of abuse that 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.

6.49 The fabrication or induction of illness (FII) is a relatively rare form of child abuse. Where concerns about FII exist, professionals must work together, evaluating all available evidence in order to understand the reasons for a child's signs and symptoms. Professionals should maintain an open mind throughout any enquiry to ensure that important information is not overlooked. We follow the guidance *Safeguarding Children in Whom Illness is Fabricated or Induced* and the TWSP FII Best Practice Guidance.

6.50 Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person.

6.51 It may include verbal abuse such as persistent criticism, belittling or name-calling, as well as denying children opportunities to express their views, deliberately silencing them or

making fun of what they say or how they communicate. Emotional abuse may involve age or developmentally inappropriate expectations, overprotection, limiting exploration and learning, or preventing participation in normal social interaction. It may include seeing or hearing the ill-treatment of another person. Emotional abuse may involve serious bullying, including cyberbullying, causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all forms of child maltreatment, although it may also occur in isolation.

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

6.53 The activities may involve physical contact, including assault by penetration, whether with a part of a person's body or an object (for example, rape or penetration with an object), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in viewing or creating sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

6.54 Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, in an institutional setting or in the wider community and are more likely to know their abuser than not.

6.55 The sexual abuse of children by other children is a specific safeguarding concern in education. All staff must be aware of this and understand the school's policies and procedures for responding to child-on-child abuse. Staff are also aware that children under the age of 13 cannot legally consent to sexual activity and that sexual activity involving a child under the age of 16 may constitute a criminal offence, regardless of whether the child appeared to agree to that activity.

6.56 Neglect**:** 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.

6.57 Neglect may occur during pregnancy, for example as a result of maternal substance misuse. 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 inappropriate caregivers; or
- ensure access to appropriate medical care or treatment.

6.58 Neglect may also include unresponsiveness to, or failure to meet, a child's basic emotional needs.

6.59 Exploitation: Exploitation occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into activity that benefits the perpetrator. Exploitation may take place online or offline, and children may not recognise that they are being exploited.

6.60 Children who have been exploited may also be victims of modern slavery, including trafficking, servitude or forced labour. Exploitation may involve one or more forms of abuse, including physical, sexual or emotional abuse and neglect. It is important to recognise that children of any gender may be subject to criminal exploitation, sexual exploitation, or both simultaneously.

6.61 Safeguarding Issues

6.62 All staff receive training on safeguarding issues and understand that safeguarding concerns often overlap. Staff recognise that children may experience multiple vulnerabilities and that these can place them at increased risk of harm.

6.63 Staff are aware that the following behaviours and indicators may be signs that a child is at risk of harm:

- drug taking and/or alcohol misuse;
- unexplained and/or persistent absence from education, home or care;
- serious violence, criminal exploitation (including county lines activity) and radicalisation; and

- the consensual and non-consensual sharing of nude and semi-nude images.

6.64 Staff are aware that Annex A of *Keeping Children Safe in Education 2026* contains additional information on these and other safeguarding issues and should be used to support professional understanding and decision-making.

6.65 All staff understand that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can have a significant impact on a child's welfare, wellbeing, mental health, educational engagement and willingness to seek help. Staff remain alert to the signs and effects of prejudice-based harm and consider these concerns within safeguarding practice where appropriate.

6.66 All staff recognise that racism, faith-targeted abuse and other forms of discriminatory behaviour may adversely affect a child's welfare, wellbeing and sense of safety. Such incidents will be taken seriously, appropriately recorded and considered within our safeguarding processes where appropriate.

6.67 Child-on-Child Abuse

6.68 All staff understand that children can abuse other children. This can occur both inside and outside the school setting, in person and online.

6.69 All staff receive training on our child-on-child abuse procedures and understand their role in preventing, identifying and responding to concerns where a child may be at risk.

6.70 All staff recognise that the absence of reported incidents does not mean that child-on-child abuse is not occurring. Concerns may go unreported for a range of reasons. Where staff have any concerns regarding child-on-child abuse, they must speak to the Designated Safeguarding Lead (DSL) or a Deputy DSL, regardless of whether a report has been made.

6.71 All staff are expected to challenge behaviours between children that may be abusive in nature. Staff understand that minimising or dismissing certain behaviours can contribute to a culture where abuse becomes normalised. Such an environment may discourage children from reporting concerns and leave them vulnerable to harm. Our procedures reflect the requirements of Part Five of *Keeping Children Safe in Education 2026*. All

reports will be taken seriously, victims will be supported and protected, and appropriate safeguarding and disciplinary action will be taken where necessary. Child-on-child abuse will never be dismissed as "banter", "just joking", "having a laugh" or "part of growing up".

6.72 All staff understand that child-on-child abuse is a safeguarding concern for both the victim and the alleged perpetrator. Staff recognise their role in identifying, preventing and responding appropriately to all forms of child-on-child abuse.

6.73 Child-on-child abuse is most likely to include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents;
- abuse within intimate personal relationships between children (sometimes referred to as teenage relationship abuse);
- physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm;
- serious physical assault or threats involving a weapon;
- sexual violence, including rape, assault by penetration and sexual assault;
- sexual harassment, including unwanted sexual comments, remarks, jokes or online sexual harassment;
- causing someone to engage in sexual activity without consent;
- the consensual and non-consensual sharing or creation of nude and semi-nude images;
- upskirting, which involves taking a photograph beneath a person's clothing without their knowledge or consent; and
- initiation or hazing behaviours involving harassment, abuse or humiliation, including those facilitated online.

6.74 We actively seek to raise awareness of and prevent all forms of child-on-child abuse by:

- educating governors, trustees, leaders, staff, learners and parents about child-on-child abuse;
- educating children about healthy relationships, consent, respectful behaviour and the safe use of technology;

- engaging parents and carers in safeguarding education;
- supporting learners' wellbeing and mental health through appropriate interventions and support services;
- promoting equality, diversity, inclusion, respect and positive values throughout the school community;
- fostering a culture in which safe, healthy and respectful relationships are expected and valued;
- responding promptly and effectively to all concerns and reports; and
- ensuring that concerns are shared with the DSL and Deputy DSLs so that patterns, trends and emerging risks can be identified and addressed.

6.75 We work proactively with the Telford and Wrekin Safeguarding Partnership (TWSP), children's social care, the police and other relevant agencies to prevent, identify and respond to child-on-child abuse. The DSL and Deputy DSLs regularly review behaviour, safeguarding and incident records to identify patterns, trends and emerging concerns at the earliest opportunity.

6.76 We recognise that any child can be vulnerable to child-on-child abuse due to the influence of peers, particularly during adolescence. Staff remain vigilant to signs of abuse among all children. Research indicates that:

- child-on-child abuse may affect boys and girls differently, although all forms of abuse are unacceptable and will be treated seriously;
- children with Special Educational Needs and Disabilities (SEND) are more vulnerable to abuse than their peers; and
- some children may experience increased vulnerability as a result of protected characteristics or aspects of their identity, including sexual orientation, ethnicity, race, religion or belief.

6.77 Child-on-child sexual violence and sexual harassment

6.78 All those who are part of our community believe that sexual violence and sexual harassment is not acceptable and will not be tolerated.

6.79 We understand that sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur online. It can also occur through a

group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap.

6.80 We recognise that 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 our setting.

6.81 We will work to ensure our whole school /college community are aware of the importance of:

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

6.82 For the purpose of this policy, we use the term ‘victim’, ‘alleged perpetrator(s)’ or where appropriate ‘perpetrator(s)’. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

6.83 Along with providing support to children who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. We recognise that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our setting. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

6.84 We understand that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted.

We also know it is also important that other children, adult students and our staff are supported and protected as appropriate.

6.85 We will try to be aware of, and respond appropriately to all reports and concerns, including those outside of our setting, and or online.

6.86 While the focus of this policy is on protecting and supporting children, we will of course protect any adults and engage with adult social care, support services and the police as required.

6.87 Tackling Violence Against Women and Girls (VAWG)

6.88 We are committed to the principles of the Government's Violence Against Women and Girls Strategy, Freedom from Violence and Abuse (2025), which prioritises early intervention and prevention, relentless pursuit of perpetrators, and support for victims and survivors, and is available here

6.89 We recognise that girls are disproportionately affected by sexual violence, harassment, and abuse, and that these harms can intersect with other vulnerabilities such as race, disability, and social disadvantage.

6.90 Our approach is trauma-informed, victim-centred, and rooted in early intervention. We will challenge all forms of gender-based violence, educate learners on consent and respect, and work with partners to disrupt harmful behaviour and protect those at risk.

6.91 We will align our work with local and national approaches to tackling Violence Against Women and Girls (VAWG). Safeguarding leaders will regularly review local strategic priorities, partnership learning, domestic homicide reviews, child safeguarding practice reviews and local needs assessments to ensure our curriculum, policies and safeguarding arrangements remain responsive to emerging risks.

6.92 One of the priority commitments in the Telford & Wrekin Partnership Domestic Abuse and VAWG Strategy 2026-2028, available here is to "Educate young people about

sexual exploitation, sexual violence and unhealthy relationships, challenging attitudes that enable abuse”

6.93 Sexual violence

6.94 Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way both inside and outside of our setting. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003 as described below:

6.95 Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

6.96 Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

6.97 Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

6.98 Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

6.99 We believe that consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

6.100 Sexual consent:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

6.101 Sexual harassment

6.102 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline, both inside and outside of our setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

6.102 While not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes;
- displaying pictures, photos or drawings of a sexual nature,
- upskirting, and
- on-line sexual harassment.

6.103 We will follow the guidance set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

6.104 Upskirting

6.105 The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. We recognise 'Upskirting' 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 sex can be a victim.

6.106 Harmful sexual behaviour

6.107 Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and

may cause developmental damage. We use the term “harmful sexual behaviour” (HSB). HSB can occur online and/or face to face and can also occur simultaneously between the two. We will consider HSB in a child protection context.

6.108 We will follow the specialist support and advice on HSB available from the specialist sexual violence sector. Our DSL will undertake training in HSB and incorporate this into our approach to managing sexual violence and sexual harassment. This training will include the Brook Traffic Light Tool.

6.109 We recognise that harmful sexual behaviour, sexual harassment and sexual violence may be influenced by harmful attitudes, stereotypes and addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We understand it is important that they are offered appropriate support.

6.110 Tackling Discrimination

6.111 When making safeguarding decisions, we actively consider whether cultural assumptions, unconscious bias, stereotyping or discrimination may have influenced professional judgement and take steps to ensure that all children receive equitable access to safeguarding support and protection.

6.112 Hate crime

6.113 A hate crime, or hate incident, is an act motivated by, or perceived to be motivated by, prejudice against who the victim is, or what they appear to be, in relation to their race, religion, sexual orientation, gender identity, or disability. These are known as protected characteristics. It does not matter if the person targeted has the characteristic that the prejudice is directed toward. Only that they are perceived to have that characteristic or belong to that community.

6.114 A hate crime does not have to amount to a criminal offence to be considered a hate crime. Non-criminal hate crime incidents can still be reported to the police to be recorded. Evidence of a hate crime is not required – it is enough that one person, such as the victim or a witness, perceives the incident to be a hate crime.

6.115 The Police and Crown Prosecution Service define hate crime as: "Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."

6.116 Hate Crime covers a range of behaviours, including discrimination, exclusion, verbal abuse, physical assault, bullying including cyber-bullying and inciting hatred.

6.117 Our response may include support for the victim, educational and disciplinary measures for the perpetrator, and involvement from relevant statutory or specialist agencies where appropriate. We will work to ensure that perpetrators understand the impact of their language and behaviour and are supported to change it.

6.118 All hate crime incidents reported in our setting must be recorded. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around hate crime.

6.119 Racist incidents

6.120 A racist incident is "any incident which is perceived to be racist by the victim or any other person", according to the Stephen Lawrence Inquiry report.

6.121 We will comply with the Equality Act 2010 and not unlawfully discriminate against learners or prospective learners on the grounds of race (or other protected characteristics).

6.122 In line with the public sector equality duty (PSED) we will:

- Eliminate discrimination and other conduct that is prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.

- Comply with both specific education law on exclusions, and general law on discrimination, when suspending or permanently excluding learners.

6.123 All racist incidents reported in our setting must be recorded.

6.124 Telford and Wrekin Council require all schools and colleges to report racist incidents on an individual and annual return, Racist Incident Reporting and Recording System (IRIS). The reporting of incidents should take place within seven days of the incident being reported or as soon as reasonably practicable. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around racist incidents.

6.125 We will manage racist incidents in line with our anti-bullying policy, behaviour policy and child-on-child abuse policy.

6.126 Our Approach to Preventing All Forms of Child-on-Child Abuse

6.127 We will undertake pre-planning, provide training for staff and implement an effective child-on-child abuse policy to establish the foundations for a calm, considered and appropriate response to any reports. These arrangements will be reviewed regularly. The Designated Safeguarding Lead (DSL), or a Deputy DSL, will engage with local safeguarding arrangements and developments relating to child-on-child abuse.

6.128 We recognise that the most effective responses to child-on-child abuse are based upon a whole-setting approach to safeguarding and child protection. We will actively involve our entire school community in creating and maintaining a safe, respectful and inclusive environment.

6.129 Systems are in place, well promoted throughout our setting, and are understandable and accessible to learners so that they can confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be taken seriously and that they can safely express their views and provide feedback.

6.130 As part of our commitment to ensuring that learners feel safe and able to report concerns, we have identified the following Deputy Designated Safeguarding Leads

(DDSLs) whom learners may approach if they do not wish to report directly to a member of the Senior Leadership Team:

- Dee Marshall - Deputy DSL, Assistant Head and Sixth Form Lead
- Rachel Hawley - Deputy DSL, Assistant Head, Child Sexual Exploitation Lead and SaLT Lead
- Lorna Deakin - Deputy DSL and SENDCo (Children in Need and Looked After Children)
- Mandy Peever - Deputy DSL, Pastoral and Medication Lead

6.131 All staff within our setting will receive training on how to recognise and respond to child-on-child abuse, including reports of sexual violence and sexual harassment. The DSL will undertake additional training to ensure they are equipped to manage and coordinate responses to such reports.

6.132 We recognise that the most effective preventative education programme is delivered through a whole-setting approach that prepares learners for life in modern Britain. Our setting promotes clear values, high standards of behaviour and positive relationships, which are demonstrated throughout all aspects of school life. This is underpinned by our behaviour policy, pastoral support systems and a planned programme of evidence-based curriculum content that is appropriate to learners' age and stage of development.

6.133 The DSL will support teaching staff in the delivery of this curriculum. We recognise that good practice provides children with opportunities to discuss difficult issues openly and safely. Such discussions may increase safeguarding disclosures and reports. Learners will therefore be made aware of how to raise concerns, make a report and access support. This includes situations where they are worried about a friend or peer. All staff understand how to support a child making a disclosure and how to respond appropriately to a safeguarding concern.

6.134 The DSL will consider whether external support, intervention or specialist assessment is required as part of our approach to managing sexual violence and sexual harassment. We recognise that specialist organisations, safeguarding partners, health services and the police can provide valuable expertise, guidance and support.

6.135 Our Response to Child-on-Child Abuse, Including Reports of Sexual Violence, Sexual Harassment and Hate Crime

6.136 We are committed to recognising, acknowledging and understanding the scale and impact of harassment, abuse and harmful behaviours. We will not minimise, dismiss or downplay behaviours that may be abusive in nature. Doing so can create an unsafe environment, normalise harmful behaviours and discourage children from reporting concerns or seeking support.

6.137 Where appropriate, we will work closely with other professionals, agencies and partners as part of our response. This may include the Telford and Wrekin Safeguarding Partnership (TWSP), local authority children's social care services, the police, health professionals and other specialist support services.

6.138 We recognise that children may not always find it easy to tell staff about abuse verbally. They may communicate their experiences through their behaviour, appearance, attendance, emotional wellbeing or interactions with others. In some cases, a child may not make a direct disclosure. Staff will therefore remain professionally curious, vigilant and responsive to any signs that a child may require help, support or protection.

6.139 This version keeps all of Telford's required content while improving readability and demonstrating a stronger safeguarding culture, which will read well for ISI inspection and governance scrutiny.

6.140 The Immediate Response to a Report

6.141 If a member of staff believes, for any reason, that a child may be at risk of or experiencing abuse from another child, or that a child may be at risk of abusing or may be abusing another child, they must discuss their concerns with the Designated Safeguarding Lead (DSL) or a Deputy DSL without delay.

6.142 We will reassure all victims that they are being taken seriously, regardless of when the incident occurred or how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of our setting will not be minimised or dismissed and will be treated with the same level of seriousness as abuse occurring within the setting. We will never give a victim the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual

harassment, nor will we make a victim feel ashamed for making a report. We will explain that safeguarding and legal processes are in place to protect children and young people rather than criminalise them, and we will do so in a manner that avoids causing unnecessary alarm or distress.

6.143 Risk Assessment and Safety Planning & Support

6.144 We recognise that child-on-child abuse can occur even where there have been no reports or disclosures. Therefore, in line with guidance from the Telford and Wrekin Safeguarding Partnership (TWSP) and Farrer & Co, we have implemented risk and needs assessments to help identify, manage and reduce the risk of child-on-child abuse.

6.145 In line with TWSP guidance, we use the term *safety planning and support* to describe the arrangements put in place for individual children following an alleged or actual incident of child-on-child abuse, including sexual violence and, where appropriate, sexual harassment.

6.146 Where there has been a report of sexual violence, the DSL (or a Deputy DSL) will ensure that an immediate safety and support plan is completed to identify risks and support needs. Where there has been a report of sexual harassment, the need for a safety and support plan will be considered on a case-by-case basis; however, as a matter of good practice, one will usually be completed.

6.147 Our risk and needs assessment will consider:

- the victim, particularly their protection, support, wishes and lived experience;
- whether there may be other victims;
- the alleged perpetrator(s);
- all other children within the setting and, where appropriate, adult students and staff, including any actions required to protect them from the alleged perpetrator(s) or future harm;
- the time and location of the incident and any action required to make the environment safer.

6.148 Where any child involved has Special Educational Needs and/or Disabilities (SEND), the DSL will liaise with the SENDCo to support the management of the case. Where a report includes an online safety element, the DSL and relevant Deputy DSLs will

consider any risks associated with technology, online communication, social media or image sharing and take appropriate action to reduce those risks.

6.149 Safety and support plans will be recorded, whether electronically or in writing, and kept under regular review. We will continually assess the risks posed to all learners and implement appropriate measures to safeguard and support them. Safety and support planning will, where appropriate, involve learners, parents, carers and relevant professionals.

6.150 The DSL (or a Deputy DSL) will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that specialist risk assessments, safety plans and support arrangements will be developed by social workers and/or specialist sexual violence services. Our own safety and support plans are intended to complement, not replace, the assessments and recommendations of specialist professionals. Any external assessments will be used to inform our approach to supporting and protecting learners and to update our own safeguarding arrangements where necessary.

6.151 Action Following a Report of Child-on-Child Abuse, Including Sexual Violence and/or Sexual Harassment

6.152 The DSL and Deputy DSLs maintain a complete safeguarding picture and are therefore best placed to advise on the setting's immediate and ongoing response. Important considerations will include:

- the wishes of the victim regarding how they wish to proceed. This is particularly important in cases involving sexual violence or sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding investigations and support arrangements, whilst recognising the school's responsibility to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;

- any power imbalance between the children involved. For example, whether the alleged perpetrator is significantly older, more mature or more confident, or whether the victim has a disability or learning difficulty;
- whether the incident is a one-off event or part of a sustained pattern of abuse;
- the fact that sexual violence and sexual harassment can occur within intimate personal relationships between peers;
- whether there are ongoing risks to the victim, other children, adult students or staff; and
- any relevant wider safeguarding concerns, including links to child sexual exploitation (CSE) or child criminal exploitation (CCE).

6.153 As with all safeguarding concerns, staff will act in the best interests of the child at all times. Immediate consideration will be given to how best to support and protect the victim, the alleged perpetrator(s), and any other children who may have been affected.

6.154 The starting point for all reports will be a clear zero-tolerance approach to sexual violence and sexual harassment. Such behaviour is never acceptable, will not be tolerated and will always be addressed through appropriate safeguarding and disciplinary procedures.

6.155 As part of effective safeguarding practice, we will do all that is reasonably possible to protect the privacy and anonymity of children involved in reports of sexual violence or sexual harassment, particularly where a case is progressing through the criminal justice system. Information will only be shared with those who have a legitimate need to know in order to safeguard and support those involved.

6.156 Options to Manage the Report

6.157 Decisions about when and how to inform an alleged perpetrator will be carefully considered. Where a report is to be referred to children's social care and/or the police, the DSL (or a Deputy DSL) will liaise with the relevant agency to agree the most appropriate next steps, including how and when allegations will be shared with the alleged perpetrator. This will not prevent the school from taking any immediate action necessary to safeguard children and reduce risk.

6.158 We will regularly review our decisions, actions and safeguarding responses, considering relevant policies, procedures and any learning arising from individual cases. We will remain alert to patterns of concerning, problematic or inappropriate behaviour. Where patterns are identified, appropriate action will be taken. Consideration will also be given to whether wider cultural issues within the setting may have contributed to the behaviour and whether additional curriculum input, learner education or staff training is required to reduce the likelihood of recurrence.

6.159 The DSL (or a Deputy DSL) will use professional judgement to:

- assess the nature and seriousness of the alleged behaviour; and
- determine whether the concerns can be managed internally or whether specialist support or intervention is required.

6.160 The DSL and Deputy DSLs will use local partnership threshold guidance to inform decision-making and, where necessary, engage with safeguarding partners regarding the most appropriate level of assessment, intervention and support.

6.161 In complex cases, the DSL (or a Deputy DSL) may consult Family Connect and/or other relevant agencies on a no-names basis, where appropriate, to help determine the most suitable course of action.

6.162 Where the DSL (or a Deputy DSL) believes that the behaviour may be abusive, violent or indicative of a wider safeguarding concern, or where the individual circumstances of the child require it, Family Connect, children's social care and/or the police will be contacted immediately and, where appropriate, within 24 hours of the concern becoming known.

6.163 The DSL (or a Deputy DSL) will discuss the allegation or concern with the relevant agency and agree an appropriate course of action, which may include:

1. Managing the matter internally.
2. Family Help support.
3. Referral to children's social care.
4. Reporting to the police.

6.164 Where statutory intervention is not required, the DSL may determine that Family Help support is appropriate. Family Help aims to strengthen family resilience, improve outcomes and prevent concerns from escalating. It can be particularly effective in addressing non-violent harmful sexual behaviour (HSB) and reducing the risk of escalation.

6.165 All concerns, discussions, decisions, actions taken and the reasons for those decisions will be accurately recorded, whether electronically or in writing, in accordance with safeguarding procedures.

6.166 Where bail conditions are in place, we will consider whether additional measures are required to manage any identified risks and ensure the safety of all members of the school community.

6.167 We recognise that there may be delays where a case progresses through the criminal justice system. We will not wait for the outcome, or even the commencement, of a police investigation before taking action to safeguard and support the victim, alleged perpetrator and other children or adults who may be affected. The DSL (or a Deputy DSL) will work closely with the police and other relevant agencies to ensure that any actions taken by the school do not compromise investigations.

6.168 Where a child receives a caution or is convicted of a sexual offence, we will review and update our risk assessment and support arrangements accordingly. We recognise the importance of continuing to safeguard both the victim and the alleged perpetrator. Where cases result in no further action (NFA) by the police or Crown Prosecution Service, or where there is a not guilty verdict, appropriate support will continue to be offered to all children involved.

6.169 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child making the allegation, and/or the individual concerned, may require additional support or protection. In some circumstances, a false allegation may itself indicate that a child is experiencing abuse or other unmet needs. Where appropriate, a referral to Family Connect or children's social care will be considered. Where a report is found to have been deliberately invented or malicious, consideration will be given to whether disciplinary action is appropriate in accordance with the school's behaviour policy.

6.170 Ongoing Response to Child-on-Child Abuse, Including Sexual Violence, Sexual Harassment and Hate Crime

6.171 We will apply the principles of effective safeguarding practice to inform all decisions relating to the protection and support of victims, alleged perpetrators and any other children affected. We will carefully consider the needs of all children involved and ensure that appropriate support is in place.

6.172 Victims may not disclose the full nature of their experiences immediately. It is essential that communication remains open, supportive and child-centred. Victims will be offered access to a trusted adult within the school who can provide ongoing support and help them communicate their wishes and needs.

6.173 A victim of sexual violence is likely to experience trauma and, in some cases, may find it difficult to participate fully within a typical classroom environment. We will avoid any action that has the effect of isolating a victim from supportive peer relationships. There may be times when a victim wishes to temporarily withdraw from lessons or activities. Any such arrangements will be made because the victim wishes them and not for the convenience of managing the situation. Where appropriate, a safe and supervised space will be made available.

6.174 Whilst every effort will be made to support victims to remain within our setting, we recognise that in some circumstances the impact of trauma may make this difficult. Alternative provision or a move to another educational setting will only be considered at the request of the victim and following consultation with parents or carers, to ensure that suitable education continues.

6.175 Please refer to our Child-on-Child Abuse Policy and associated procedures for additional guidance.

6.176 We will routinely check in with all children involved, or alleged to have been involved, in incidents of child-on-child abuse. This enables us to ensure that safeguarding procedures have been followed, support remains effective and children feel listened to and protected.

6.177 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

6.178 We recognise that exploitation exists on a continuum of need. Concerns may present as vulnerable, complex or acute within the Telford & Wrekin Pathway to Support. Early identification, information sharing, timely intervention and effective multi-agency working are essential to preventing escalation and safeguarding children from harm.

6.179 We recognise that both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. This may be in exchange for something the child needs or wants, for the financial gain or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence.

6.180 Exploitation may be committed or facilitated by individuals, organised crime groups or gangs, and children may identify as belonging to or being associated with these groups. CCE and CSE can affect children of any gender and may involve children being moved for the purpose of exploitation, commonly referred to as trafficking. Such circumstances may constitute modern slavery. Where a child is identified as a potential victim of exploitation, appropriate safeguarding and modern slavery referrals will be made in accordance with statutory guidance.

6.181 Information about Child Criminal Exploitation can be found within the Home Office *Serious Violence Strategy*. We recognise that CSE and CCE can affect children of any gender and that children with additional vulnerabilities may face increased risks of exploitation.

6.182 We recognise that different forms of harm frequently overlap and that perpetrators may subject children and young people to multiple forms of abuse, including criminal exploitation and sexual exploitation. In some cases, the exploitation may be in exchange for something the child needs or wants and/or for the financial benefit, status or advantage of the perpetrator or facilitator.

6.183 Children can be exploited by adults or by other children, acting alone or as part of a group. Where a child is exploiting another child, it is important to recognise that they may themselves be victims of exploitation and require safeguarding support.

6.184 Whilst age may contribute to an imbalance of power, there are many other factors that can increase a child's vulnerability to exploitation. These may include sexual identity, cognitive ability, learning difficulties, communication needs, physical strength, social status and access to economic or other resources.

6.185 Indicators of Exploitation

6.186 Staff understand that children who are being sexually or criminally exploited may not recognise themselves as victims and that indicators can easily be mistaken for typical adolescent behaviour. Staff are expected to exercise professional curiosity and consider the wider context of any concerns.

6.187 Indicators may include:

- unexplained gifts, money, clothing, mobile phones or other possessions;
- changes in attendance, behaviour or presentation;
- unexplained absences or episodes of going missing;
- being collected by unknown adults or vehicles;
- concerning online activity or excessive use of mobile phones and social media;
- association with new or older friendship groups;
- withdrawal from family, friends or previously enjoyed activities;
- injuries, marks, tattoos or unexplained physical harm;
- alcohol or substance misuse;
- sexual health concerns;
- deterioration in emotional wellbeing, including self-harm or suicidal thoughts;
- involvement in anti-social or criminal behaviour, including possession of weapons; and
- expressions of fear, secrecy, control or dependence within relationships.

6.188 Staff will consider these indicators alongside all available safeguarding information and, where exploitation is suspected, will follow the Telford & Wrekin Child Abused

Through Exploitation (CATE) pathway, utilise the Pathway to Support Guidance and seek advice from Family Connect, the CATE Team and other safeguarding partners as appropriate.

6.189 Staff will avoid assumptions, stereotypes or preconceived views regarding victims or perpetrators and will focus on evidence, professional curiosity and identified safeguarding need.

6.190 We will provide additional support to children who have experienced exploitation to help them remain engaged in education and achieve positive outcomes.

6.191 Staff understand that the experiences of girls who are criminally exploited may differ from those of boys and that indicators may present differently. Staff recognise that girls can be victims of criminal exploitation and that both boys and girls who are criminally exploited may also be at increased risk of sexual exploitation.

6.192 Where concerns arise that a child may be experiencing exploitation, we will follow the Telford & Wrekin Exploitation Care and Support Pathway. We will utilise the *Explore More* guidance and consult with the appropriate children's social care team and safeguarding partners. Where concerns are escalated to a CATE Risk Panel, we will attend wherever possible as part of our commitment to effective multi-agency working.

6.193 We will ensure that parents, carers, children and young people are aware of relevant TWSP CATE resources and leaflets. We will also provide information about the National Crime Agency's Child Exploitation and Online Protection (CEOP) Command, which can be used to report concerns about online grooming or sexual exploitation.

6.194 We take a proactive approach to reducing the risk of exploitation. This includes engaging with lived-experience learning opportunities, supporting staff development and raising awareness among learners and families. All staff will receive regular training and safeguarding updates relating to child exploitation.

6.195 As an independent special school, we recognise that many of our learners have complex learning, communication, developmental and social needs. Safeguarding education, including awareness of CSE, CCE, healthy relationships, consent, online safety and wider safeguarding risks, will be delivered in ways that are appropriate to learners' age, cognitive ability, communication needs and level of understanding. Staff will adapt

teaching approaches and resources to ensure safeguarding messages are accessible, meaningful and relevant to every learner.

6.196 Our curriculum includes an age-appropriate and developmentally appropriate programme of safeguarding and exploitation awareness. Particular emphasis is placed on child sexual exploitation, child criminal exploitation, healthy relationships, personal safety and online safety.

6.197 The Headteacher, DSL and Deputy DSLs will share relevant information with local safeguarding partners as required to support the protection of children. As an independent special school for learners aged 8 to 19 years, the DSL and Deputy DSLs will attend exploitation briefings delivered by West Mercia Police and Telford & Wrekin Council. The designated CSE lead will attend the local CSE DSL network.

6.198 The DSL and designated CSE Lead will maintain a strategic focus on exploitation, particularly CSE, and will provide information to safeguarding partners where required. The CSE Lead will be known to learners, families and staff and will be accessible to children who wish to seek support or advice.

6.199 We record all safeguarding concerns, including those relating to exploitation. Records will clearly identify concerns, actions taken and required follow-up actions. The DSL will review safeguarding records, particularly those relating to CSE and CCE, at least every six months to ensure concerns are appropriately recorded, monitored and shared with relevant agencies.

6.200 We will undertake an annual review of site security arrangements, including monitoring and recording unauthorised access to the site. This is intended to reduce opportunities for exploitation and increase protection for learners. Findings from site security audits will inform risk assessments and future safeguarding planning. Parents and carers will be invited to contribute to the review process.

6.201 Any significant site security breaches or near misses will be reported to our Health and Safety Provider. Telford & Wrekin Education Safeguarding services will also be informed where appropriate.

6.202 We will act in the spirit of the recommendations made for schools and colleges within the *Independent Inquiry into Telford Child Sexual Exploitation* (2022) and will use local and national learning to strengthen our safeguarding practice.

6.203 We will use the Telford & Wrekin Pathway to Support Guidance, including the Child Exploitation Risk Threshold Indicator and *Explore More* resources, to identify and respond to exploitation concerns. Where a child's needs are identified as vulnerable, complex or acute, referrals will be made to Family Connect. Relevant exploitation intelligence will be shared with West Mercia Police using the Protected Partner Intelligence Form. In emergencies, concerns will be reported via 999. For non-emergencies, information will be shared via 101 or the appropriate West Mercia Police contact channels.

6.204 Child Criminal Exploitation (CCE)

6.205 Some specific forms of Child Criminal Exploitation (CCE) include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime, or threatening and committing serious violence.

6.206 We recognise that children can become trapped by this form of exploitation, as perpetrators may threaten victims and their families with violence, coerce them into debt, or use intimidation and control to maintain their involvement. Children may be pressured into carrying weapons, including knives, or may begin carrying weapons because they fear harm from others. We recognise that children involved in criminal exploitation may not always be viewed as victims because they may commit offences as part of their exploitation. We understand that a child cannot consent to being exploited, abused or trafficked and may not recognise that exploitation is taking place. We are aware that the experiences and indicators of criminal exploitation may differ for boys and girls, and that both boys and girls who are criminally exploited may also be at increased risk of sexual exploitation.

6.207 Child Sexual Exploitation (CSE)

6.208 We use the Telford & Wrekin Safeguarding Partnership definition of Child Sexual Exploitation (CSE). CSE is a form of modern slavery in which a child under the age of 18 is sexually exploited for the benefit or gain of another individual or group. This benefit may

include financial gain, increased status or power. Some victims are trafficked for the purpose of exploitation.

6.209 Perpetrators may use a range of methods including grooming, manipulation, violence, bullying, intimidation and coercion. Grooming may involve providing a child with food, accommodation, affection, gifts, money, alcohol, drugs, cigarettes or other items in exchange for sexual activity. Increasingly, perpetrators use online platforms to target and exploit vulnerable children. Abuse may occur entirely online or alongside offline exploitation.

6.210 We recognise that CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration, rape, oral sex, masturbation, kissing, rubbing and touching outside clothing. It may also involve non-contact abuse, such as creating sexual images, viewing sexual activity, sexual grooming or encouraging children to behave in sexually inappropriate ways, including through the internet or social media.

6.211 CSE can occur as a one-off incident or over a prolonged period of time. It may involve force, coercion, intimidation, manipulation or grooming and may occur without the child's immediate knowledge, for example when images or videos are distributed online without their consent.

6.212 Staff are aware that CSE can affect any child who has been coerced into engaging in sexual activity, including 16 and 17 year olds who are legally able to consent to sexual activity. Some children do not see themselves as victims and may believe they are in a genuine romantic relationship.

6.213 Additional indicators that may suggest CSE include children who:

- have significantly older boyfriends or girlfriends;
- experience sexually transmitted infections;
- display sexualised behaviour beyond expected developmental norms; or
- become pregnant.

6.214 We will make available to staff the latest guidance on recognising and responding to child sexual exploitation, including *Child Sexual Exploitation: Guide for Practitioners*.

6.215 We recognise that victims of CSE are not always identified as victims and may be criminalised for actions they have undertaken whilst under coercion or control. We understand that children are often manipulated, groomed and exploited without fully understanding the abuse they are experiencing. All professionals within our setting understand the indicators and seriousness of both CSE and CCE and will act to ensure children receive appropriate protection, support and intervention.

6.216 We recognise that group-based CSE is a distinct and serious form of abuse, often involving multiple perpetrators and complex grooming practices. In line with the National Audit on Group-Based Child Sexual Exploitation and Abuse (2025), we are committed to identifying and responding to group-based exploitation quickly, professionally and effectively.

6.217 Staff are trained to take disclosures seriously, act without delay and challenge any culture of silence, minimisation or inaction. We will never allow concerns about cultural sensitivity, community relationships or stereotypes to prevent us from safeguarding children. The welfare of the child remains paramount at all times.

6.218 Our response to CSE is trauma-informed, victim-centred and focused on long-term recovery and support. We work closely with children's social care, the police, health services and specialist organisations to disrupt exploitation and safeguard children.

6.219 County Lines

6.220 County lines is a term used to describe gangs and organised criminal networks involved in exporting and distributing illegal drugs using dedicated mobile phone lines or other forms of "deal line". This activity may take place locally or across the country; no specific distance of travel is required.

6.221 Children and vulnerable adults are frequently exploited to store, transport and sell drugs and money. Perpetrators often use coercion, intimidation, violence, sexual violence and weapons to maintain control over victims.

6.222 Children may be targeted and recruited through a variety of locations, including schools, alternative provision settings, children's homes, residential care settings and community environments.

6.223 Children are increasingly recruited through online platforms and social media. County lines groups may create drug debts, use intimidation or make threats of violence or kidnapping against children and their families to prevent them from leaving criminal networks.

6.224 Many indicators of CSE and CCE may also indicate county lines involvement. Additional indicators include children who:

- go missing from home or education and are later found in other areas;
- have been victims, perpetrators or alleged perpetrators of serious violence;
- receive drug-related requests through mobile phones;
- move drugs or collect money on behalf of others;
- are exposed to practices such as "plugging" to conceal drugs;
- are found in properties with which they have no connection, including "trap houses" or cuckooed properties;
- owe debts to exploiters; or
- have bank accounts used by others to facilitate criminal activity.

6.225 We will make relevant Home Office guidance regarding county lines available to staff.

6.226 Where a child is suspected to be involved in or at risk of county lines exploitation, a safeguarding referral will be made and the availability of specialist support services and third-sector organisations will be considered.

6.227 Modern Slavery and the National Referral Mechanism (NRM)

6.228 Staff understand that modern slavery includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, criminal exploitation, servitude, forced labour, forced criminality and the removal of organs.

6.229 We are aware that guidance regarding the indicators of modern slavery, available support and referral processes is contained within the Modern Slavery Statutory Guidance. All concerns relating to child exploitation will be referred to children's social care. Where indicators suggest that a child may be a victim of modern slavery through exploitation, consideration will be given to a referral through the National Referral Mechanism (NRM).

6.230 Serious Violence

6.231 All staff are aware of indicators that may suggest a child is at risk of or involved in serious violence. These indicators may include increased absence from education, changes in friendships, associations with older individuals or groups, declining educational performance, self-harm, deterioration in wellbeing, assault injuries, unexplained injuries, gifts or possessions, and involvement with criminal networks or gangs.

6.232 Staff understand that involvement in serious violence may be associated with factors such as exclusion, persistent absence, previous offending, child maltreatment and criminal exploitation.

6.233 We recognise that risks may increase during the periods immediately before and after school when learners are travelling to and from the setting. These times may present particular vulnerabilities for young people at risk of serious violence or exploitation.

6.234 We will follow the Home Office guidance *Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance*.

6.235 We recognise that effective violence prevention requires a combination of universal, targeted and specialist interventions. We will:

- develop learners' knowledge and skills in conflict resolution;
- challenge aggressive or harmful behaviour appropriately;
- identify and support vulnerable groups;
- strengthen safeguarding and child protection arrangements;
- carefully manage transitions between educational settings, including alternative provision; and
- work collaboratively with local partners to prevent anti-social behaviour and crime.

6.236 We recognise the importance of understanding the challenges faced by young people within both the school and the wider community. We will work with community partners to identify risks, strengths and opportunities for support.

6.237 We will work alongside local community safety partnerships, youth offending teams, neighbourhood policing teams and other relevant agencies. We will cooperate with relevant authorities in accordance with the Police, Crime, Sentencing and Courts Act 2022.

6.238 As part of our emergency management planning, we have systems in place to identify and respond to risks associated with individual and group violence. We recognise the importance of building resilience and preventing escalation wherever possible.

6.239 We recognise that early intervention is one of the most effective ways of preventing children from becoming involved in violence, crime or anti-social behaviour. We will identify and implement interventions that best meet the needs of our learners.

6.240 Any disclosure, suspicion or intelligence relating to weapon carrying, access to weapons, threats involving weapons or planned violence will be treated as a safeguarding concern and immediately referred to the Designated Safeguarding Lead (DSL).

6.241 Child Abduction and Community Safety Incidents

6.242 We recognise child abduction as the unauthorised removal or retention of a child by a parent, carer or any other person who does not have lawful authority to do so. Child abduction can be perpetrated by family members, individuals known to the child, such as neighbours, friends or acquaintances, or by strangers.

6.243 We recognise that community safety incidents occurring in the vicinity of the school may cause concern for children, families and staff. Examples may include individuals loitering near the school site, suspicious activity, or unknown adults attempting to engage children in conversation.

6.244 As children become older and are granted greater independence, for example when travelling to and from school independently, we will provide practical and age-appropriate advice to help them remain safe. This may include personal safety education delivered by school staff or external agencies. We will aim to build children's confidence, resilience and personal safety skills rather than focusing solely on warnings about strangers.

6.245 Children and the Court System

6.246 We recognise that some children may be required to give evidence in criminal courts, either in relation to crimes committed against them or offences they have witnessed. We will signpost children and families to appropriate guidance and resources to help them understand the process.

6.247 We will follow relevant guidance to ensure that the correct procedures are followed and that appropriate support and special measures are made available to children where required.

6.248 We understand that child arrangements proceedings following parental separation can be a stressful and emotionally challenging time for families and may increase conflict between adults. We recognise the impact this can have on children and will follow relevant Ministry of Justice guidance when supporting families during such circumstances.

6.249 Children with Family Members in Prison

6.250 We recognise that children with a parent or close family member in prison may be at increased risk of poor outcomes, including poverty, stigma, isolation and poor mental health. We will utilise guidance and resources available through the National Information Centre on Children of Offenders (NICCO) to help mitigate the potential impact on children and provide appropriate support.

6.251 Cybercrime

6.252 We understand that cybercrime refers to criminal activity committed using computers and/or the internet. Cybercrime is broadly categorised as either:

- Cyber-enabled crime, which can occur offline but is enabled at scale or speed through the use of technology; or
- Cyber-dependent crime, which can only be committed through the use of computers or digital technology.

6.253 Examples of cyber-dependent crime include:

- unauthorised access to computer systems (illegal hacking), such as attempting to access school systems to obtain examination materials or alter grades;
- denial of service (DoS) or distributed denial of service (DDoS) attacks, which aim to disrupt access to systems, networks or websites; and
- creating, supplying, obtaining or distributing malware, including viruses, spyware, ransomware, botnets and remote access trojans, with the intention of committing further offences.

6.254 We recognise that children with particular skills and interests in technology and computing may inadvertently or deliberately become involved in cyber-dependent crime although this is unlikely given the cognitive abilities of our learners.

6.255 Where concerns arise regarding a child's involvement in cybercrime, the DSL (or a Deputy DSL) will consider whether referral to the Cyber Choices or Cyber Sprinters programme, or other appropriate support, would be beneficial.

6.256 Parent Conflict

6.257 We are committed to supporting positive family relationships and constructive communication. We recognise that healthy relationships are key to children's wellbeing and development.

6.258 Positive relationships should be accessible to everyone and not viewed as a privilege. We understand that stress can place significant pressure on family relationships and negatively affect communication. Whilst it may not always be possible to remove sources of stress, we can support people to communicate more constructively and manage difficulties in healthier ways.

6.259 When working with families, we have a unique opportunity to promote positive communication and support relationships rather than contributing to conflict or misunderstanding.

6.260 We will use solution-focused approaches to support families in identifying what positive change looks like for them and how they can work towards achieving it. We recognise that this is often more effective than offering advice or solutions on behalf of others.

6.261 When supporting families experiencing relationship difficulties, we will:

- avoid making assumptions and seek to understand the thoughts and feelings of all parties;
- remain professionally curious and explore what may be contributing to difficulties;
- encourage a culture of appreciation, respect and kindness, recognising that positive reinforcement is often more effective than blame;

- recognise that individuals may not always feel ready or able to make changes, and that meaningful change requires willingness as well as support; and
- use thoughtful, open and reflective questions to encourage discussion and understanding, rather than attempting to "fix" problems or impose solutions.

6.262 Domestic Abuse

6.263 Domestic abuse can encompass a wide range of behaviours and may occur as a single incident or as a pattern of behaviour. Abuse may be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse in their own right. They may witness, hear or experience the effects of abuse within the home and may also experience domestic abuse within their own intimate relationships. Domestic abuse can have a significant and long-lasting impact on a child's health, wellbeing, development and ability to learn.

6.264 Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent violence and abuse. Anyone can experience domestic abuse regardless of age, ethnicity, disability, sex, gender identity, sexual orientation, religion, socio-economic circumstances or background. Domestic abuse can occur both within and outside the home.

6.265 We recognise that children can be adversely affected by witnessing or experiencing domestic abuse between family members. Exposure to domestic abuse can have a serious and lasting impact on emotional wellbeing and mental health. Children may feel responsible for the abuse, blame themselves, experience fear and anxiety, or be displaced from their home as a result of domestic abuse.

6.266 Young people may also experience abuse within their own intimate relationships. This form of child-on-child abuse is often referred to as teenage relationship abuse. Whilst such relationships may not fall within the statutory definition of domestic abuse where one or both parties are under the age of 16, any concerns regarding a child's welfare or safety will be managed through child protection and safeguarding procedures. Both victims and perpetrators will be offered appropriate support.

6.267 We recognise that domestic abuse may affect children differently depending upon their age, developmental stage, communication needs, additional needs and individual

circumstances. As an independent special school, we will ensure that support, interventions and safeguarding responses are appropriately adapted to meet the needs of each learner.

6.268 We will always work collaboratively with relevant agencies where domestic abuse is identified as a feature within family life. Children within our care will be supported as required. We participate in Operation Encompass, through which information relating to domestic abuse incidents is shared with the school so that timely and appropriate support can be provided to affected children.

6.269 We will contribute to relevant multi-agency processes where appropriate, including:

- Multi-Agency Risk Assessment Conferences (MARAC);
- Domestic Abuse Perpetrator Programmes (DAPP);
- Multi-Agency Public Protection Arrangements (MAPPA); and
- other safeguarding or statutory processes where domestic abuse may be impacting upon a child's welfare and development.

6.270 We will refer to guidance published by the Telford and Wrekin Safeguarding Partnership relating to the impact of domestic abuse on children and young people.

6.271 Refuge operates the National Domestic Abuse Helpline, which is available 24 hours a day, free of charge and in confidence, on 0808 2000 247. Information, advice and support are also available through its website, including arrangements for a safe call-back at a chosen time.

6.272 We will make use of the following resources to support identification of and responses to domestic abuse affecting children and young people:

- NSPCC guidance on domestic abuse, including signs, symptoms and impact on children;
- Refuge guidance on domestic abuse and its effects on children;
- SafeLives resources relating to young people and domestic abuse;
- Domestic abuse specialist sources of support; and
- Operation Encompass guidance and resources.

6.273 Homelessness

6.274 We understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

6.275 We will consider homelessness in the context of children who live with their families, and intervention will be on that basis.

6.276 We recognise in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. In these cases, we will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

6.277 Honour or faith-based abuse (including female genital mutilation and forced marriage)

6.278 We recognise that Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. Staff are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. Staff understand these dynamics and the additional risks associated with honour or faith-based abuse when determining appropriate safeguarding action.

6.279 If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy).

6.280 The designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

6.281 FGM

6.282 Staff understand that FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

6.283 We will follow the National FGM Centre Female Genital Mutilation: Guidance for schools.

6.284 FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. We understand that it will be rare for teachers to see visual evidence and know that they should not be examining learners or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

6.285 Teachers and tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate.

6.286 In respect of FGM we will adopt the local FGM Practice Guidelines and Resource Pack as part of safeguarding responsibilities and inform/educate our staff in this particular area.

6.287 Forced marriage

6.288 We understand that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into 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 into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We play an important role in safeguarding children from forced marriage.

6.289 We will follow the Forced Marriage Unit published statutory guidance and Multi-agency guidelines. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk

6.290 Preventing radicalisation

6.291 We understand children may be susceptible to radicalisation into terrorism. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

- 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 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.

6.293 Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

6.294 We understand it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being

radicalised. As with other safeguarding risks, through appropriate training staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately. This must include reporting concerns to the DSL (or a deputy), who will consider whether a Prevent referral is required.

6.295 The Prevent duty

6.296 We are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

6.297 We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210.

6.298 As a college/sixth form we will follow the additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

6.299 We will follow the published advice for schools on the Prevent duty.

6.300 We aim to ensure all staff have completed training on the Prevent duty.

6.301 This policy reflects the Prevent Duty Guidance for England and Wales (2023), which came into force on 31 December 2023. We recognise our statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism."

6.302 We adopt a whole-setting approach to Prevent, ensuring that all staff are trained to identify signs of radicalisation and extremism, understand the referral process, and know how to respond proportionately. Our DSL and senior leaders are familiar with the 2023 guidance, including the revised definitions of extremism and terrorism, and the expectations for risk assessment, partnership working, and information sharing.

6.303 We work in close partnership with the local authority, police, and Channel Panel, and follow the local Prevent referral pathway. Our curriculum promotes fundamental British values and resilience to extremist narratives. We also ensure that our filtering and

monitoring systems are reviewed annually and are proportionate to the risks identified in our Prevent risk assessment.

6.304 Channel

6.305 Channel is a voluntary, as a 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. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so. We will attend and engage with the Channel panel to assist in any assessment.

6.306 We will follow the Channel guidance.

6.307 If we feel children are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU). This is done with a National Prevent referral form, following the Prevent flowchart contained in annex 1. The referral will be sent to the police.

6.308 As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is Jas Bedesha, jas.bedesha@telford.gov.uk. The education lead for Telford & Wrekin Council is Joanne Hanslip, joanne.hanslip@telford.gov.uk. Where necessary, the DSL (or a deputy) will consult with the Telford and Wrekin professional lead, education lead or CTU officers: Alison Potts, a.potts@west-midlands.pnn.police.uk, or Holly Aungiers, holly.aungiers@westmercia.police.uk, to seek advice on making prevent referrals.

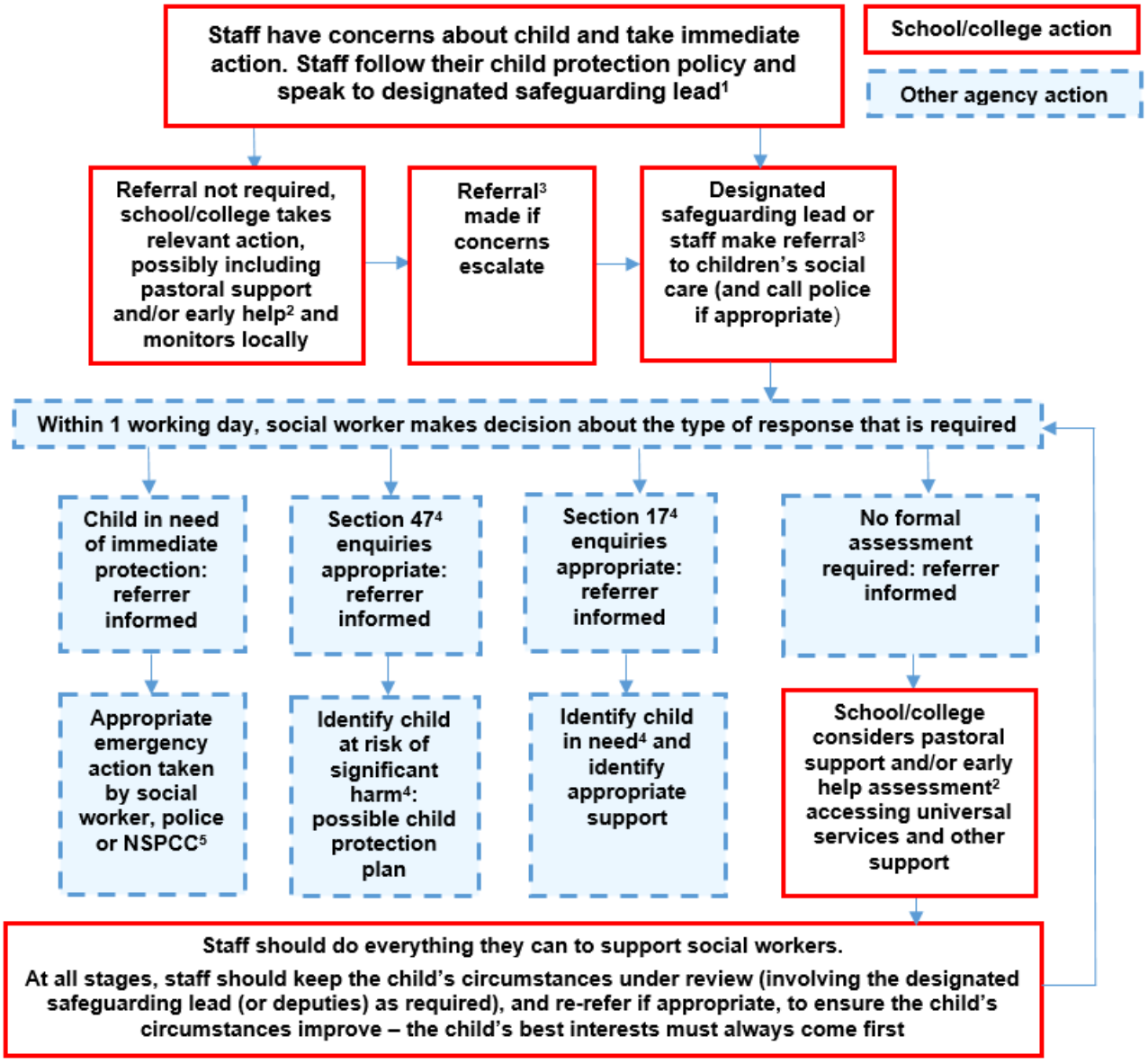
6.309 Family Connect (MASH) will discuss with Police HAU to support the completion of a risk assessment at the earliest opportunity.

6.310 If referral is adult led and children are identified as being present / resident within the family home, the referral form will be shared with Family Connect along with all supporting evidence

6.311 What to do if you have concerns about the safety or welfare of a child

6.312 Staff working in our setting maintain the attitude of 'it could happen here' where safeguarding is concerned and will always act in the best interests of the child.

6.313 If staff have any concerns about a child's welfare, they must act on them immediately. The following flow chart sets out the process for staff when they have concerns about a child. It begins by completing a Sensitive Information Form (SIF) which can be located in the school reception.



6.314 Where someone has a concern about the welfare of a child, they should speak to the DSL (or a deputy) and complete a SIF. Options will then include;

- managing any support for the child internally via our own pastoral support processes;
- providing early help support and/or undertaking an early help assessment; or
- making a referral to statutory services, for example, as the child is in need or suffering or likely to suffer significant harm or impairment. This will involve contacting Family Connect or the local social care team for the child. When making a referral to children's social care staff will ensure they are aware of the child's history, such as any previous concerns about the child or their family, so that they can share this information with children's social care staff.

6.315 The law does not say an age when parents can leave a child on their own, but it is an offence to leave a child alone if it places them at risk. The NSPCC says:

- children under 12 are rarely mature enough to be left alone for a long period of time
- children under 16 should not be left alone overnight
- babies, toddlers and very young children should never be left alone.

6.316 Where we discover a child under 12 has been left alone for long periods of time at home or in the community we will contact the police. We will never escort a child back to school where we find them alone at home or in the community. Where a child under 16 is alone and we feel it is placing them at risk we will contact the police. Where children are alone because they have left school without permission and parents cannot locate the child quickly, we will view the child as being at risk and will contact the Police. We will report all concerns about children being alone to the police, via 101. If the child is immediate danger, then we will report to the police, via 999. We will then notify Family Connect or the emergency duty team as soon as reasonably practicable.

6.317 NPCC- When to call the police will be considered by the DSL or Deputy DSL to help them understand when they should consider calling the police and what to expect when they do.

6.318 All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the request for service form Concerned about the welfare of a child - Online form - Telford & Wrekin Council

6.319 If in exceptional circumstances, the DSL or a deputy is not available, the person who has the concern should speak to a member of the senior leadership team and/or take advice from Family Connect or the local social care team for the child. In these circumstances, any action taken should be shared with the DSL (or a deputy) as soon as is practically possible.

6.320 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. If in any doubt about sharing information, staff should speak to the DSL or a deputy.

6.321 In the unlikely event of a person in our school who has a concern for a child is not satisfied with the action taken by the DSL or a deputy they should speak to them again to share their concerns. If they remain unsatisfied with the response, then the person who had the original concern should speak to another trained DSL to seek resolution. If following speaking to another trained DSL the person remains concerned that appropriate action has not been taken to safeguarding or protect the child, the person should report their original concern to Family Connect or the local social care team for the child and follow the school/college Whistleblowing procedures.

6.322 Staff should be aware that older learners with SEND or additional vulnerabilities may require levels of supervision and support that differ from those typically expected for their chronological age. Decisions regarding safety and welfare should always take account of a learner's individual needs and capacity.

6.323 Referral agencies

Telford & Wrekin social care team	Shropshire social care team	Staffordshire social care team	Wolverhampton social care team
Family Connect	**First Point of Contact**	**Children's Advice and Support Service**	**MASH**
01952 385385	**0345 678 9021**	**0300 111 8007**	**01902 555392**
Out of Hours	**Out of Hours**	**Out of Hours**	**Out of Hours**
01952 676500	**0345 678 9040**	**0345 604 2886**	**01902 552999**
If you think a child is in immediate danger, **call the Police on 999** For non-Police emergencies, call 101			
Childline **0800 1111**	**NSPCC** **0800 800 5000**	**Public Protection Unit (West Mercia Police):** **0300 333 3000**	

6.324 Immediate Response to a Child or Parent

6.325 Staff will follow effective safeguarding practice, which includes:

- where possible, managing disclosures or reports with two members of staff present, preferably one of whom is the Designated Safeguarding Lead (DSL) or a Deputy DSL. However, this will not always be possible;
- where a report includes an online element, having regard to *Searching, Screening and Confiscation* guidance and UKCIS guidance regarding sharing nudes and semi-nudes. The primary consideration is that staff must not view, download, copy or distribute illegal images of a child. In circumstances where viewing an image is unavoidable, staff will follow the relevant statutory guidance. In some circumstances, devices may need to be confiscated and preserved as evidence before being handed to the police;
- not promising confidentiality at the outset, as concerns will usually need to be shared with the DSL, children's social care, police or other relevant agencies to ensure appropriate safeguarding action can be taken. Information will only be shared on a need-to-know basis. Children and parents will be supported to understand what will happen next and who information may be shared with;
- recognising that a child is likely to disclose concerns to someone they trust, and that this could be any member of staff within our setting. Staff must recognise the trust placed in them and respond in a supportive, respectful and child-centred manner;

- recognising that some children may face additional barriers to disclosure because of disability, communication needs, special educational needs, culture, ethnicity, sex, gender identity or sexual orientation;
- listening carefully to the child, using their language where possible, remaining calm and non-judgemental, explaining boundaries and next steps, avoiding leading questions and using open prompts such as "where", "when", "what happened", or TED questions such as "Tell me", "Explain to me" and "Describe". Staff may ask whether a child has been harmed and the nature of the harm, but must avoid conducting their own investigation;
- considering the most appropriate method of recording the concern. Best practice is to write a detailed account immediately after the disclosure so that full attention can be given to listening to the child. Where notes are taken during a conversation, staff must remain engaged with the child and avoid creating the impression that note-taking is more important than listening. In all cases, a contemporaneous first-hand written record must be made;
- recording only factual information as presented by the child. Records must not contain personal opinions or assumptions. Staff recognise that safeguarding records may form part of children's social care assessments or criminal investigations; and
- informing the DSL (or a Deputy DSL) as soon as reasonably practicable where they have not been directly involved in receiving the disclosure.

6.326 We recognise that learners, who have special educational needs and disabilities, may communicate concerns through changes in behaviour, distress, physical presentation, communication aids, social interaction, emotional responses or other non-verbal means. Staff will take account of each learner's communication profile, developmental stage and individual needs when identifying, responding to and recording safeguarding concerns.

6.327 Where conversations need to take place and confidentiality is essential to the child's welfare, these discussions will be held in an appropriate location away from general areas where privacy could be compromised.

6.328 We will never allow concerns about information sharing to prevent action being taken to safeguard children. We expect:

- concerns arising during the morning to be reported to the DSL (or a Deputy DSL) by lunchtime wherever possible;
- concerns arising during the afternoon to be reported by the end of the school day or as soon as reasonably practicable; and
- concerns arising outside normal school hours to be reported at the earliest opportunity.

6.329 If in doubt, staff should always seek advice from the DSL (or a Deputy DSL).

6.330 Delay in reporting safeguarding concerns is unacceptable and may result in disciplinary action.

6.331 Where a child is suffering, or is likely to suffer, harm or impairment, we will make an immediate referral to children's social care and, where appropriate, the police. If there is uncertainty regarding which local authority is responsible for the child, we will use the "Report Child Abuse to Your Local Council" service to identify the appropriate children's social care team.

6.332 Children's social care assessments should consider the contexts in which harm occurs, including circumstances outside the home. We will therefore provide as much relevant information as possible to support a contextual safeguarding approach and enable assessments to consider all available evidence.

6.333 Our role is to receive information, record concerns accurately and make appropriate referrals. Under no circumstances should staff attempt to investigate safeguarding concerns themselves. We will work appropriately with children, families and partner agencies to protect and promote welfare. We will work in partnership and adhere to the principles of the Telford & Wrekin Safeguarding Partnership (TWSP) *Pathway to Support Guidance*.

6.334 Staff may be required to support other agencies and professionals through Early Help Assessments and other intervention processes, sometimes acting as the Lead Professional. Such cases will be regularly reviewed and monitored, with consideration given to referral for statutory intervention where a child's circumstances do not improve or worsen.

6.335 Staff will understand the referral pathways into children's social care and the statutory assessments that may follow. This includes:

- Section 17 of the Children Act 1989 relating to Children in Need; and
- Section 47 of the Children Act 1989 relating to children suffering, or likely to suffer, significant harm.

6.336 Staff will also understand their responsibilities within these assessment processes.

6.337 A Child in Need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services, whose health or development is likely to be significantly impaired without such services, or who is disabled. Local authorities have a duty to provide services designed to safeguard and promote the welfare of Children in Need. Such children may be assessed under Section 17 of the Children Act 1989.

6.338 Local authorities have a duty under Section 47 of the Children Act 1989 to make enquiries where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries help determine what action may be required to safeguard and promote the child's welfare. Section 47 enquiries may arise from concerns relating to abuse, neglect, exploitation, female genital mutilation, so-called honour-based abuse, radicalisation, child sexual exploitation, child criminal exploitation or other safeguarding concerns.

6.339 Where visible injuries are observed, staff must record them using a body map and describe them as accurately, objectively and factually as possible. Wherever possible, good evidential practice will be followed by ensuring that two members of staff verify and record the observed injury on the body map before a safeguarding referral is made.

6.340 Under no circumstances should staff photograph injuries observed on children. Staff are not expert witnesses and should not attempt to gather photographic evidence. Where there are concerns regarding non-accidental injury, an immediate referral should be made to Family Connect or the relevant children's social care team. Decisions regarding medical examination, photography and evidential recording will be made by the appropriate safeguarding, healthcare and investigative professionals.

6.341 Staff will assess concerns based on the presenting information and the individual circumstances of the child. Where bruising or injuries are identified, staff will refer to the TWSP Bruising in Children Guidance to support professional decision-making and determine the most appropriate safeguarding response.

6.342 The Role of the Local Authority

6.343 Within one working day of a referral being made, a local authority social worker should acknowledge receipt of the referral and decide upon the next steps and the type of response required. This will include determining whether:

- the child requires immediate protection and urgent action;
- services are required for the child and family, and if so, what type;
- the child is a Child in Need and requires assessment under Section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm and requires assessment under Section 47 of the Children Act 1989; and
- any specialist assessments are required to support decision-making.

6.344 The referrer, whether or not they are the DSL (or a Deputy DSL), should follow up with children's social care if this information is not received within the expected timescales.

6.345 Where a referral has been made, including referrals relating to Child Criminal Exploitation (CCE) or Child Sexual Exploitation (CSE), and the child's circumstances do not appear to be improving, we will follow the relevant TWSP escalation procedures or the escalation procedures of the safeguarding partnership responsible for the child to ensure concerns are appropriately addressed and the child's situation improves.

6.346 The Director of Children's Services for Telford & Wrekin Council is Jo Britton.

6.347 Record Keeping

6.348 Staff must record and report all safeguarding concerns immediately, or as soon as reasonably practicable, following a disclosure, incident, observation or concern, and writing it down using a Sensitive Information Form (SIF).

6.349 Staff are expected to:

- record concerns factually and objectively;
- record the child's own words wherever possible;
- distinguish between fact, opinion and professional judgement;
- inform the DSL or a Deputy DSL on the same working day; and
- upload or attach relevant supporting documentation where appropriate.

6.350 The DSL and Deputy DSLs regularly review safeguarding records to identify patterns, emerging themes, recurring concerns and learners who may require additional support or intervention.

6.351 All concerns must be recorded first-hand by the individual raising the concern using either:

- a Sensitive Information Form (SIF); or
- the school's electronic safeguarding system Behaviour Watch.

6.352 Concerns must be passed to the DSL or a Deputy DSL without delay. The DSL or Deputy DSL will record all safeguarding discussions, actions, decisions and the rationale for those decisions. Information will be treated as confidential and stored securely.

6.353 Separate safeguarding records are maintained for each learner. Concerns that meet safeguarding thresholds and involve Family Connect are recorded within the Child Protection and Safeguarding Log. Concerns that do not meet statutory safeguarding thresholds but require monitoring are recorded within the Low-Level Concerns and Wellbeing File.

6.354 Safeguarding records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a record of actions taken, decisions reached and outcomes.

6.355 We follow the requirements of KCSIE 2026 regarding the secure transfer, retention and review of child protection records. Safeguarding records are reviewed regularly and transferred securely when a learner moves to another setting.

6.356 Any visitor, member of staff, volunteer or bank staff member who is unsure about recording requirements should seek advice from the DSL or a Deputy DSL.

6.357 Anyone recording a safeguarding concern should:

- record the date, time, place and context of the concern;
- record who the information was shared with and when;
- identify where discussions took place and any personal safety considerations;
- accurately record observations of injuries, including size, location and colour where appropriate;
- record the child's or parent's actual words wherever possible;
- record any significant non-verbal behaviours or presentation;
- avoid interpretation or speculation; and
- retain original handwritten notes and provide these to the DSL or Deputy DSL.

6.358 Visitors, temporary staff and bank staff should record concerns using a Sensitive Information Form (SIF), available from Reception. The individual must notify the DSL or a Deputy DSL immediately once a concern arises. Once completed, the SIF will be given directly to the DSL or Deputy DSL and uploaded to the learner's safeguarding chronology to maintain a first-hand safeguarding record.

6.359 The school uses the secure electronic recording system Behaviour Watch. This system enables the school to maintain a comprehensive safeguarding chronology and provides a secure record of a learner's safeguarding journey throughout their time at the school.

6.360 The DSL and Deputy DSLs oversee all safeguarding records held within Behaviour Watch. Access is restricted to authorised safeguarding personnel only. Staff must not assume that entering information onto Behaviour Watch constitutes immediate notification to the DSL. Where concerns are urgent, a direct verbal discussion with the DSL or Deputy DSL must also take place.

6.361 Safeguarding concerns are stored chronologically within each learner's safeguarding record.

6.362 What to Do if You Have Safeguarding Concerns About Another Staff Member

6.363 If a safeguarding concern or allegation is made about a member of staff, including bank staff, volunteers or contractors, which may indicate that they pose a risk of harm to children:

- the concern must be reported to the Headteacher;
- concerns relating to the Headteacher must be reported to the Proprietor; and
- where concerns relate to a Headteacher who is also the Proprietor, the matter must be reported directly to the Local Authority Designated Officer (LADO) through Family Connect.

6.364 All concerns relating to staff conduct, including low-level concerns, must be recorded using a Sensitive Information Form (SIF) and immediately passed to the Headteacher or Proprietor, as appropriate. A dedicated low-level concerns record will be maintained and reviewed in accordance with Part Four of KCSIE 2026.

6.365 Allegations that may meet the harms threshold will be managed in accordance with Part Four, Section One of KCSIE 2026. Concerns that do not meet the harms threshold will be managed as low-level concerns in accordance with Part Four, Section Two. Where appropriate, referrals will be made to Family Connect or the child's local authority children's social care team.

6.366 The school will only undertake sufficient preliminary enquiries to establish the basic facts and determine whether further action is required. Under no circumstances will the school conduct its own formal safeguarding investigation.

6.367 The LADO will be informed of all allegations that appear to meet the criteria set out in Part Four, Section One of KCSIE 2026. The LADO will liaise with children's social care and the police as appropriate. All LADO referrals must be made via Family Connect unless the child already has an allocated social worker, in which case the referral will be made through the allocated social worker.

6.368 The SAS and Proprietor will be notified of allegations and low-level concerns through established governance arrangements. The SAS safeguarding lead will be informed at the earliest appropriate opportunity. Their role is to ensure safeguarding procedures are followed appropriately and to provide challenge and support where required. They will not be involved in operational investigation or case management.

6.369 A referral to the Disclosure and Barring Service (DBS) will be made where a person engaged in regulated activity has been removed from their role due to safeguarding concerns or would have been removed had they not resigned.

6.370 We recognise that all adults working within the school occupy positions of trust. We therefore expect the highest standards of professional conduct. In accordance with KCSIE, the school maintains a separate Staff Code of Conduct which applies to employees, volunteers, contractors, Support and Scrutiny Team members and any other adults working within the school community.

6.371 The Safer Recruitment Consortium's *Guidance for Safer Working Practice for Adults Working with Children and Young People in Education Settings* will be made available to all staff and will operate alongside the school's Code of Conduct and established HR procedures.

6.372 To reduce the risk of safeguarding concerns and protect both learners and staff, classrooms and learning areas should remain visible and open to appropriate observation. Covering or masking classroom windows is not permitted except in exceptional circumstances, such as specific teaching activities. Any exception must be authorised by the Headteacher and be justified, proportionate and risk assessed.

6.373 Please refer to the school's Pathways and separate policies for managing safeguarding concerns and allegations against staff, including bank staff, volunteers and contractors.

6.374 What to Do if You Are Concerned About Safeguarding Practice Within the School

6.375 All staff, Support and Scrutiny Team (SAS), volunteers and contractors should feel able to raise concerns about poor, unsafe or ineffective safeguarding practice. Such concerns will be treated seriously and addressed appropriately by school leaders.

6.376 Staff should refer to the school's Whistleblowing Policy where concerns relate to safeguarding practice, leadership decisions or organisational culture.

6.377 Where staff feel unable to raise concerns internally, they may access independent advice through the NSPCC Whistleblowing Helpline. Guidance is also available through the government's whistleblowing advice services.

- NSPCC Whistleblowing Helpline: 0800 028 0285
- Email: help@nspcc.org.uk

6.378 Staff should never feel prevented from raising safeguarding concerns where they believe children may be at risk of harm.

7.0 Part Two: The Management of Safeguarding

7.1 The Proprietor with responsibility for safeguarding is Mrs Anita Brown. The designated lead with responsibility for Prevent is Bev Doran. Their roles are to provide strategic leadership and oversight of safeguarding, child protection and welfare arrangements across the school.

7.2 The Proprietor will ensure that the Designated Safeguarding Lead (DSL) is afforded sufficient time, funding, training, resources and support to undertake the role effectively.

7.3 The Proprietor has strategic leadership responsibility for safeguarding arrangements and must ensure that the school complies with its duties under relevant legislation and statutory guidance. The Proprietor must have regard to *Keeping Children Safe in Education 2026* (KCSIE) and ensure that safeguarding policies, procedures, training and practice remain effective and legally compliant at all times.

7.4 The Proprietor works with school leaders to establish a clear vision and culture that places learner welfare, safeguarding and child protection at the centre of school life. This includes actively promoting the fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs.

7.5 The Proprietor will assure themselves of the effectiveness of safeguarding arrangements through regular review of:

- Single Central Record (SCR) compliance;
- filtering and monitoring arrangements;
- safeguarding audit findings;
- attendance and absence data;
- child-on-child abuse trends;
- staff safeguarding training compliance;
- Family Help activity;

- exploitation referrals;
- children with social workers;
- attendance of vulnerable cohorts; and
- outcomes arising from safeguarding supervision.

7.6 The SAS Team and Proprietor recognise that effective safeguarding requires robust oversight, challenge and assurance. Safeguarding is a standing item within governance arrangements and SAS Team receives regular safeguarding reports, information and updates to enable effective scrutiny and fulfil safeguarding responsibilities.

7.7 SAS Team will seek assurance regarding the effectiveness of safeguarding arrangements through:

- safeguarding link visits and reports;
- review of safeguarding audits, external reviews and action plans;
- scrutiny of safeguarding and child protection data and trends;
- oversight of attendance, persistent absence and severe absence;
- review of children with social workers, looked after children, previously looked after children and other vulnerable groups;
- monitoring incidents of child-on-child abuse, sexual harassment, hate incidents and discriminatory behaviour;
- review of filtering, monitoring and online safety arrangements;
- scrutiny of safer recruitment processes and the Single Central Record;
- monitoring safeguarding training compliance and induction arrangements;
- review of safeguarding supervision arrangements;
- learner voice, parent voice and staff voice activities;
- assurance regarding Family Help, child protection and multi-agency working; and
- review of safeguarding themes, patterns, emerging risks and lessons learned.

7.8 SAS will provide strategic challenge and support to leaders, ensuring safeguarding arrangements remain effective, compliant with statutory guidance and responsive to the needs of learners. Where areas for development are identified, SAS will ensure appropriate action plans are implemented, monitored and reviewed.

7.9 An annual safeguarding report will be presented to SAS Team and the Proprietor to evaluate the effectiveness of safeguarding arrangements, monitor safeguarding priorities and identify areas requiring further development.

7.10 The Headteacher will ensure that all safeguarding and child protection policies and procedures adopted by the Proprietor are understood, implemented and consistently followed by all staff.

7.11 The Proprietor has received appropriate safeguarding and child protection training, including online safety training, as part of their induction. This enables appropriate strategic challenge and assurance regarding the effectiveness of the school's safeguarding arrangements. Safeguarding training will be updated annually.

7.12 The Proprietor will fulfil responsibilities under the Data Protection Act 2018, UK GDPR, Human Rights Act 1998, Equality Act 2010 (including the Public Sector Equality Duty) and local multi-agency safeguarding arrangements.

7.13 Our Approach to Safeguarding

7.14 The Proprietor will ensure that the school adopts a whole-school approach to safeguarding. Safeguarding and child protection will underpin all relevant policies, processes, systems and decision-making. The best interests of the child will remain at the heart of all practice.

7.15 Where safeguarding concerns arise, the Proprietor and senior leaders will ensure that the wishes and feelings of the child are considered when determining actions and support. Systems for reporting concerns will be well promoted, easily understood and accessible to learners, enabling them to report concerns confidently and know they will be taken seriously. We will actively work to remove barriers that may prevent children from seeking help.

7.16 Staff will be encouraged and supported to contribute to the development, review and improvement of safeguarding arrangements and the Child Protection and Safeguarding Policy.

7.17 Appropriate arrangements will be in place to provide safeguarding supervision for staff. Further information can be found in the school's Safeguarding Supervision Policy.

7.18 Policies and Procedures

7.19 We will maintain appropriate safeguarding policies and procedures to ensure timely, effective and proportionate action is taken to safeguard and promote the welfare of children.

7.20 The Designated Safeguarding Lead (DSL)

7.21 The Proprietor has appointed Bev Doran as the Designated Safeguarding Lead (DSL) and Dee Marshall, Mandy Peever, Lorna Deakin and Rachel Hawley as Deputy Designated Safeguarding Leads. Their safeguarding responsibilities are clearly defined within their job descriptions.

7.22 The Headteacher, Bev Doran, holds ultimate responsibility for safeguarding and child protection, online safety and oversight of the school's filtering and monitoring arrangements. As DSL and a member of the senior leadership team, Bev Doran will ensure safeguarding remains a strategic priority across the school.

7.23 The DSL will fulfil all responsibilities outlined within Annex B of KCSIE 2026, including responsibility for understanding and overseeing filtering and monitoring arrangements, supporting staff, managing referrals and ensuring effective safeguarding practice throughout the school.

7.24 During term time, the DSL and/or a Deputy DSL will always be available during normal operating hours to discuss safeguarding concerns. Appropriate safeguarding cover will also be arranged for educational visits, extended provision, out-of-hours activities and holiday periods where required.

7.25 Prior to any educational visit, a risk assessment will be completed to determine whether the DSL or a Deputy DSL should attend. Where safeguarding concerns arise during an educational visit, the DSL or a Deputy DSL must be informed immediately, regardless of whether they are physically present. The DSL will provide advice and coordinate any necessary safeguarding response or referral.

7.26 The DSL and Deputy DSLs will complete the two-day TWSP recognised *Newly Appointed Designated Safeguarding Lead* training programme and will attend TWSP recognised DSL refresher training every two years.

7.27 In addition to formal training, knowledge and skills will be updated regularly through:

- Education Safeguarding noticeboard updates;
- TWSP safeguarding communications;
- termly DSL update sessions;
- safeguarding networks; and
- regular review of local and national safeguarding developments.

7.28 The school aims to ensure that at least one DSL or Deputy DSL attends each termly update session. DSLs will disseminate relevant safeguarding information and learning to staff and SAS Team as appropriate.

7.29 The DSL will participate in the Telford & Wrekin safeguarding network and maintain effective two-way information sharing with the Education Safeguarding Team. The DSL will also ensure that emerging local and national safeguarding learning is shared appropriately with staff, leaders and SAS Team.

7.30 The DSL will complete and submit the annual Safeguarding Audit - Education to the Telford & Wrekin Safeguarding Partnership.

7.31 As a school with a sole Proprietor rather than a governing body, we will ensure that the member of the senior leadership team appointed as DSL is able to carry out the role with sufficient independence, particularly where concerns or allegations involve the Proprietor or members of the Proprietor's family.

7.32 This includes providing written confirmation within the DSL role that they may contact the Local Authority Designated Officer (LADO) directly where they believe concerns cannot be appropriately managed internally. Where necessary, the school will also consider providing access to appropriate independent advice, professional consultation or legal guidance to support the DSL in discharging these responsibilities effectively.

7.33 Multi-agency working

7.34 The DSL and any deputies will work with other agencies in line with Working Together to Safeguard Children 2026. We are committed to embedding the national multi-agency child protection standards. These standards guide our practice in identifying, assessing,

and responding to safeguarding concerns, and ensure that our work with partners is timely, proportionate, and focused on improving outcomes for children.

7.35 Where appropriate, the DSL will maintain effective links with the Education Family First Partnership Lead- Mr Joedy Parton - educationffpp@telford.gov.uk and work with any other Family Help professionals to ensure children and families receive coordinated support. The school will contribute fully to Family Help assessments, Team Around the Family arrangements, Family Group Decision Making and Multi-Agency Child Protection Team activity where appropriate.

7.36 We support the Families First reforms and will engage constructively with Family Help arrangements and Multi-Agency Child Protection Teams (MACPTs). We will contribute fully to multi-agency assessments, planning, information sharing and child protection activity to ensure children receive coordinated support and protection.

7.37 We will work proactively with MACPTs, contributing information, attending meetings and supporting multi-agency planning where children are subject to statutory child protection intervention.

7.38 We will contribute fully to strategy discussions, child protection enquiries, initial child protection conferences, review conferences, core groups and child protection plans.

7.39 The child's lived experience will be central to all safeguarding decision making and assessment. The views, wishes, feelings and daily experiences of children will be actively sought, recorded, analysed and used to inform support and protection plans.

7.40 We will support Family Network approaches and Family Group Decision Making processes to help identify strengths within the wider family and support sustainable safeguarding plans.

7.41 Our Overley Hall Board, SAS Team & Proprietor and the DSL are familiar with the TWSP arrangements. In Telford & Wrekin Schools and colleges have been named as relevant agencies by the TWSP. We will engage with the TWSP as required and follow the Telford & Wrekin Pathway to Support Guidance or the appropriate Safeguarding

partnership guidance for where the child resides or for who is responsible for the child, to follow their local protocol for assessments.

7.42 When assessing levels of need, we utilise the Telford & Wrekin Pathway to Support and consider whether a child's circumstances meet Universal, Vulnerable, Complex or Acute levels of need.

7.43 The Overley Hall Board/SAS Team and proprietor of this setting expect staff to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

7.44 We recognise that harm may occur in extra-familial contexts including school, neighbourhoods, peer groups, online environments and public spaces. Safeguarding assessments will consider these contexts alongside family circumstances.

7.45 The DSL is expected to consider the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

7.46 Information Sharing

7.47 All child protection records are clearly identified as safeguarding records and are stored securely within the school's safeguarding recording systems, including Behaviour Watch, with access restricted to authorised safeguarding personnel only. The individuals responsible for safeguarding records are clearly identified, accountable and known within the school. Procedures are in place to ensure that access is removed promptly when a member of staff leaves the school or is absent on long-term leave. Any physical safeguarding files released to authorised professionals will be signed out and signed back in upon return.

7.48 Child protection records are maintained separately from educational records. Where records are requested as part of safeguarding, statutory or legal processes, both

educational and safeguarding files may be required. Appropriate systems are in place to record the release and return of files, ensuring a clear audit trail is maintained.

7.49 Learner records will be retained in accordance with statutory requirements and recognised records-retention guidance. Where records reach the end of their retention period, they will be securely destroyed in accordance with the school's records management and data protection procedures.

7.50 Where records are requested by the police under the Data Protection Act 2018, the appropriate disclosure documentation will accompany any release of information, and a copy of the request and information shared will be retained securely for audit purposes.

7.51 The school will have regard to the *Information Sharing Advice for Safeguarding Practitioners*. Where advice is required, the school will consult its Data Protection Officer, Telford Educational Services. When releasing information to the police or other agencies, appropriate identification checks will be undertaken and a clear record maintained detailing what information was shared, with whom, and the lawful basis for sharing.

7.52 Anonymised safeguarding and child protection data form an important part of safeguarding performance monitoring. Such information may be shared with staff, SAS Team, the Proprietor and relevant agencies for the purposes of quality assurance, safeguarding oversight and service improvement.

7.53 In managing information sharing we will have regard to:

- Chapter One of *Working Together to Safeguard Children*;
- *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers*, including the seven golden rules for information sharing;
- Information Commissioner's Office (ICO) guidance; and
- the Department for Education Data Protection Toolkit for Schools.

7.54 When a learner leaves the school, the DSL will ensure that the child protection file is transferred securely to the receiving school or college as soon as possible and within five working days of the learner starting at their new setting. Confirmation of receipt will always be obtained. Child protection records will be transferred separately from the main learner file. Where we are the receiving school, the DSL or Deputy DSL will review the

safeguarding information received, record receipt and ensure that relevant staff, including the SENDCo where appropriate, are informed on a need-to-know basis.

7.55 In addition to the transfer of the child protection file, the DSL will share relevant safeguarding information with the receiving setting where necessary, including information relating to Channel involvement or other ongoing safeguarding arrangements. The school will not retain copied child protection files once transferred. Instead, a chronology will be retained for audit purposes and to evidence the transfer process.

7.56 Child protection records are reviewed annually by the DSL or a Deputy DSL to ensure they are accurate, factual, chronological and appropriately maintained. Records relating to Child Sexual Exploitation (CSE) will be reviewed at least every six months. Where safeguarding reports are prepared for statutory meetings, they will include relevant attendance information and any other information required to support effective safeguarding decision-making.

7.57 Fears about sharing information must never stand in the way of safeguarding and promoting the welfare of children.

7.58 We will follow the guidance regarding child protection records and file management contained within Annex B of KCSIE 2026.

7.59 Opportunities to Teach Safeguarding

7.60 We teach learners how to keep themselves and others safe, including online safety. Our RSHE curriculum is delivered in accordance with the RSHE Statutory Guidance (2025). It is developmentally and cognitively appropriate, inclusive and designed to equip learners with the knowledge, understanding and skills required to recognise abuse, report concerns, understand healthy relationships and support their physical and emotional wellbeing. RSHE forms an integral part of our wider safeguarding culture.

7.61 We will ensure that filtering and monitoring systems do not create unreasonable restrictions on what learners can be taught regarding online safety, digital resilience and safeguarding.

7.62 Safeguarding themes are embedded throughout the curriculum, including RSHE, PSHE, Computing and pastoral programmes. Lessons are adapted to meet the individual needs of learners, and English as an Additional Language (EAL). Learner voice is actively used to inform curriculum planning and safeguarding priorities. Staff are trained to deliver safeguarding content in a developmentally appropriate, inclusive and responsive manner.

7.63 As an independent special school, safeguarding education is adapted to learners' age, developmental stage, communication profile, cognitive ability and individual needs. Staff use appropriate strategies, visual supports, repetition, reinforcement and differentiated approaches to ensure safeguarding messages are accessible, meaningful and can be applied by learners in everyday situations.

7.64 Safeguarding is embedded across the curriculum where cognitively appropriate. Through RSHE, PSHE, Computing and wider learning opportunities pitched at cognitive abilities with meaningful differentiation, learners will be provided with the knowledge and skills to support the development of understanding towards:

- healthy and respectful relationships;
- consent and personal boundaries;
- online safety and digital resilience;
- mental health and emotional wellbeing;
- risks associated with child criminal exploitation and child sexual exploitation;
- extremism and radicalisation;
- bullying, discrimination and prejudice;
- substance misuse awareness;
- personal safety; and
- how to seek help and report concerns.

7.65 Safeguarding curriculum content is informed by safeguarding data, learner voice, local safeguarding intelligence, emerging risks and the needs of our school community. The curriculum is reviewed regularly to ensure it remains relevant, responsive and effective in meeting learners' needs.

7.66 Online Safety

7.67 Online safety is an integral part of our safeguarding arrangements. We recognise that children experience both the benefits and risks associated with digital technologies. Our approach seeks to educate, empower and protect children through a combination of:

- age-appropriate and appropriately differentiated online safety education that is meaningful and accessible to all learners;
- staff training and awareness;
- appropriate filtering and monitoring systems;
- active parental engagement; and
- robust safeguarding and behaviour procedures.

7.68 We regularly review risks relating to content, contact, conduct and commerce and ensure our online safety arrangements remain responsive to emerging threats, including AI-generated content, deepfake imagery, nudification technologies, misinformation, disinformation and online exploitation. Concerns relating to online safety are recorded and managed in accordance with school safeguarding procedures and reviewed regularly by the DSL and Online Safety Lead.

7.69 We recognise that online safety is a significant safeguarding concern and that digital technologies form an important part of children's daily lives.

7.70 We believe it is essential that children are safeguarded from potentially harmful and inappropriate online material and supported to use technology safely, responsibly and confidently.

7.71 The aim of our online safety approach is to empower learners and staff to use technology safely and responsibly, while ensuring effective systems are in place to identify, intervene and escalate concerns where appropriate. We will ensure appropriate filtering and monitoring is in place on school devices and networks. We aim to:

- protect children from illegal, inappropriate and harmful content;
- protect children from harmful online interactions;
- promote positive and responsible online behaviour;
- help learners recognise and respond appropriately to online risks; and
- protect children from commercial exploitation and online fraud.

7.72 As an independent special school, we recognise that many

learners may be particularly vulnerable to online risks due to communication difficulties, learning needs, social vulnerabilities or difficulties understanding intent, relationships and risk. Online safety education and safeguarding responses will therefore be adapted to meet individual learner needs and levels of understanding.

7.73 The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate such interactions. Examples include peer pressure, commercial advertising, adults posing as children or young adults, and online grooming for sexual, criminal, financial or other forms of exploitation.
- Conduct: online behaviour that increases the likelihood of, or causes, harm. This may include making, sending or receiving explicit images, including those generated using AI; consensual and non-consensual sharing of nudes and semi-nudes; sharing other explicit content; cyberbullying; harassment; or other harmful online behaviour.
- Commerce: risks associated with online gambling, inappropriate advertising, phishing, financial scams and exploitation through commercial activity. Where learners, families or staff appear to be at risk, we may make reports to the Anti-Phishing Working Group (APWG) and other relevant organisations.

7.74 Online safety will remain a running and interrelated theme throughout safeguarding practice. We will consider online safety when developing policies, planning the curriculum, undertaking staff training, defining the responsibilities of the DSL and Deputy DSLs, and engaging with parents and carers.

7.75 We meet the Department for Education's Filtering and Monitoring Standards (2023) and undertake an annual review of our filtering and monitoring arrangements, including a risk assessment of online access, usage and exposure.

7.76 In accordance with KCSIE 2026 Annex B, the DSL and Online Safety Lead understand the filtering and monitoring systems in place, are appropriately trained and know how to escalate concerns. We ensure that filtering and monitoring arrangements are proportionate to the risks faced by our learners and provide a safe online environment.

7.77 The DSL and Online Safety Lead work together to review the effectiveness of filtering and monitoring arrangements annually and respond appropriately to issues identified through those systems.

7.78 Generative Artificial Intelligence (AI)

7.79 In line with the Department for Education's *Generative AI: Product Safety Expectations (2025)*, we recognise the importance of ensuring that any generative AI tools used within school are safe, age-appropriate and aligned with our safeguarding responsibilities.

7.80 We will ensure that:

- AI tools are risk-assessed before use, with particular consideration given to safeguarding, data protection and misinformation risks;
- staff and learners are educated about the limitations of generative AI, including the potential for bias, hallucinated content and inappropriate outputs;
- generative AI is not used to make decisions about individual learners, particularly in relation to safeguarding, behaviour or SEND provision;
- learners' personal information and intellectual property are protected;
- AI-generated content is critically evaluated and learners are taught to question the reliability and origin of online material, including deepfakes and synthetic media;
- staff understand both the risks and opportunities associated with AI;
- AI use complies with the school's data protection, filtering and monitoring arrangements; and
- only AI tools that meet relevant safety expectations are adopted and regularly reviewed.

7.81 Staff understand that AI-generated content, including deepfake imagery, synthetic media and AI-assisted grooming, may be used to facilitate abuse, exploitation, bullying,

harassment, extortion or misinformation. Concerns involving AI-generated content will be managed through safeguarding procedures in the same way as any other safeguarding concern.

7.82 Parents, Carers and Remote Learning

7.83 We recognise our responsibility to support parents and carers in keeping children safe online and will signpost families to appropriate advice, guidance and support services.

7.84 Where learners access remote or online learning from home, we will follow relevant safeguarding guidance for schools and colleges. We also recognise the value of resources produced by organisations such as the NSPCC and PSHE Association.

7.85 Through regular communication with parents and carers, we will reinforce the importance of online safety and explain the filtering and monitoring systems used by the school. We will make clear what online platforms learners are expected to access and who they may interact with online as part of their education.

7.86 Filtering, Monitoring and Cyber Security

7.87 In fulfilling our duty to safeguard and promote the welfare of children, we will take all reasonable steps to minimise learners' exposure to online risks through the effective use of filtering and monitoring technologies.

7.88 The leadership team, DSL and Online Safety Lead will maintain a clear understanding of the filtering and monitoring arrangements in place, manage them effectively and ensure concerns are escalated appropriately.

7.89 The appropriateness of filtering and monitoring arrangements is informed, in part, by the school's Prevent risk assessment. To meet Department for Education expectations, we will:

- identify and assign clear responsibilities for filtering and monitoring systems;
- review filtering and monitoring arrangements at least annually;
- block harmful and inappropriate content without unreasonably impacting learning; and
- maintain monitoring arrangements that effectively support safeguarding.

7.90 We maintain appropriate levels of cyber security to safeguard learners, staff, systems and school information. Security arrangements are reviewed periodically to respond to emerging cyber threats and technological developments.

7.91 We will undertake an annual review of online safety arrangements supported by a risk assessment that reflects the risks faced by our learners.

7.92 The SAS and Proprietor will seek assurance from school leaders regarding the effectiveness of online safety arrangements, filtering and monitoring systems, staff training, cyber security and emerging online risks.

7.93 Mentors of trainee teachers and newly qualified teachers will provide induction, support, development and monitoring in relation to online safety and digital safeguarding.

7.94 The school maintains a range of information technology, cyber security and acceptable-use policies. These include staff and learner Acceptable Use Agreements, social media expectations, data protection procedures, Behaviour Watch protocols and cyber security arrangements. All staff are expected to understand and adhere to these requirements at all times.

7.95 Mobile and Smart Technology

7.96 Our school is a mobile phone-free environment by default. We adhere to the statutory guidance on *Mobile Phones in Schools*, whereby learners do not have access to personal mobile phones during the school day, including lessons, transitions, breaktimes and lunchtime.

7.97 We recognise that some learners may require access to mobile or smart technology for specific medical, communication, assistive technology or safeguarding purposes. Any such arrangements will be individually risk assessed, agreed by senior leaders and regularly reviewed.

7.98 Learners are not permitted to use mobile phones during the school day unless authorised by a senior member of staff for medical, educational, communication or safeguarding purposes.

7.99 Mobile phones brought onto site must remain switched off and stored securely in accordance with school procedures.

7.100 Staff must not use personal devices to communicate directly with learners or parents unless this forms part of an approved school system or safeguarding arrangement.

7.101 Photographs and videos of learners will only be taken using school-approved devices and systems and in accordance with the school's safeguarding, data protection and acceptable use procedures.

7.102 Visitors are expected to comply with school safeguarding expectations regarding the use of mobile phones, smart devices and other recording technology whilst on site.

7.103 Inspection

7.104 We recognise our responsibilities for safeguarding within the regulatory and inspection framework for independent schools. We will comply with all relevant safeguarding requirements, legislation and standards and cooperate fully with inspection and regulatory processes.

7.105 Independent Schools

7.106 As an independent special school, we have clear processes and pathways to determine the suitability of placements for children and young people with additional needs. This includes the safe management of medication, healthcare needs, therapy provision, communication needs and other individual support arrangements.

7.107 We will comply with all relevant standards, regulations and guidance applicable to independent special schools and will ensure safeguarding arrangements remain consistent with statutory requirements and best practice.

7.108 The Use of Reasonable Force

7.109 There are circumstances in which it is appropriate for staff to use reasonable force to safeguard children and young people. The term *reasonable force* covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain a child. This can range from guiding a child to safety by the arm to more serious

circumstances such as preventing violence, injury, serious damage to property or a learner leaving a safe environment.

7.110 Reasonable force means using no more force than is necessary in the circumstances. It may include passive physical contact, such as standing between learners or blocking a learner's path, or active physical contact, such as leading a learner by the arm away from danger.

7.111 We will always follow the Department for Education guidance on the *Use of Reasonable Force in Schools*. We will also have regard to the guidance *Reducing the Need for Restraint and Restrictive Intervention for Children and Young People with Learning Disabilities, Autistic Spectrum Conditions and Mental Health Difficulties in Health and Social Care Services and Special Education Settings*.

7.112 We do not believe that a blanket "no contact" approach would enable staff to effectively safeguard and support learners. Staff may use appropriate physical contact where this is necessary and proportionate. Decisions regarding the use of reasonable force will always be based upon professional judgement, individual circumstances and an assessment of risk.

7.113 When responding to incidents involving learners with SEND, mental health needs or medical conditions, staff will carefully consider the individual's vulnerabilities and needs. We will have regard to our duties under the Equality Act 2010, including reasonable adjustments, non-discrimination and the Public Sector Equality Duty.

7.114 We will promote positive and proactive behaviour support through personalised behaviour support plans, risk assessments and collaborative planning with learners, parents and carers wherever appropriate. Our aim is to reduce the likelihood of behaviours that challenge and minimise the need for restrictive intervention.

7.115 Reasonable force will only be used as a last resort where de-escalation and preventative strategies have been unsuccessful, or where immediate action is necessary to prevent harm.

7.116 Hiring Out Our Facilities and Premises

7.117 Where we hire or rent our facilities or premises to organisations or individuals, including community groups, sports organisations and providers of extracurricular activities, we will ensure that appropriate arrangements are in place to safeguard children and young people.

7.118 Where activities are delivered directly by the school, our own safeguarding arrangements will apply. Where services are provided independently by another organisation, we will seek assurance that they have appropriate safeguarding and child protection arrangements in place.

7.119 This may include:

- reviewing safeguarding and child protection policies;
- obtaining evidence of safer recruitment procedures;
- checking staff training arrangements;
- seeking assurance regarding DBS checks where appropriate;
- confirming procedures for managing safeguarding concerns; and
- ensuring effective communication arrangements exist between the provider and the school.

7.120 Safeguarding requirements will be included within any hire agreement, lease or transfer-of-control arrangement. Failure to comply with safeguarding requirements may result in termination of the agreement.

7.121 We will have regard to the guidance *Keeping Children Safe in Out-of-School Settings* and will expect all organisations using our premises to meet appropriate safeguarding expectations.

7.122 Where we believe there may be a safeguarding, reputational or legal risk arising from the use of our premises, we reserve the right to refuse, suspend or terminate any hire agreement.

7.123 We will ensure that hirers acknowledge that the school has a duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). Hirers must use the premises in a manner that supports this duty and complies with safeguarding expectations.

7.124 We will take all reasonable steps to ensure that our facilities are not used by individuals or groups seeking to promote extremist views, hatred, intolerance or unlawful activity.

7.125 Absent from Education

7.126 We recognise that prolonged, repeated or unexplained absence from education can be a significant indicator of safeguarding concerns. Our response to persistent absence and children absent from education supports the identification of abuse, neglect, exploitation and other safeguarding risks and helps prevent learners from becoming children missing education.

7.127 This includes situations where concerns are emerging, as well as circumstances involving children who are already known to children's social care, including those who are Children in Need, subject to Child Protection Plans or Looked After Children. In such cases, absence from education may increase existing safeguarding risks within the family or wider community.

7.128 A learner is considered severely absent where attendance is 50% or below. Persistent absence is defined as attendance below 90%, although safeguarding concerns may arise even where attendance remains above this threshold.

7.129 The Attendance and Behaviour Lead will follow established local authority procedures, including the completion of all required notifications, documentation and processes relating to children absent from education and learners accessing modified timetables.

7.130 We recognise that learners who are not accessing full-time education may be at increased risk of abuse, neglect and exploitation. We will therefore seek to minimise the use of modified timetables.

7.131 Where a modified timetable is agreed:

- it will only be used for the shortest possible period;
- there will be a clear plan for reintegration into full-time education;
- arrangements will be regularly reviewed;

- the learner's welfare and safety will be closely monitored; and
- regular contact will be maintained by school staff.

7.132 We do not expect learners who are subject to a Child Protection Plan, Child in Need Plan or Education, Health and Care Plan (EHCP) to be placed on a modified timetable except in exceptional circumstances where this is clearly justified, documented and regularly reviewed.

7.133 Wherever reasonably possible, the school will hold more than one emergency contact number for each learner. This goes beyond the legal minimum requirement and provides additional opportunities to contact responsible adults where a learner's absence raises welfare or safeguarding concerns.

7.134 Where a child subject to a Child Protection Plan has been absent from school for two consecutive days, the child's allocated social worker will be informed.

7.135 Where learners leave the classroom or school grounds without permission, staff will respond in accordance with the school's Behaviour Policy, safeguarding procedures, individual risk assessments and behaviour support plans.

7.136 We recognise that some learners may leave classrooms or learning environments due to communication needs, anxiety, sensory dysregulation, trauma responses, emotional distress or other SEND-related factors. Staff will take account of these vulnerabilities when determining an appropriate response.

7.137 The school's practice is informed by Section 3(5) of the Children Act 1989:

"Anyone who has care of a child without parental responsibility may do what is reasonable in all the circumstances to safeguard and promote the child's welfare."

7.138 Where a learner leaves class, staff will seek to establish their whereabouts and obtain support from colleagues where necessary. Staff will not unnecessarily pursue a learner if doing so may escalate risk but will take reasonable action to maintain oversight and safeguard their welfare.

7.139 Where a learner leaves the school premises and cannot be located promptly, parents/carers will be contacted immediately. Where appropriate, the police will also be informed that the learner has left the premises and may be at risk.

7.140 Where children go missing, including leaving school without permission, we will follow the West Mercia Pathway for Children who Go Missing from Home, Care or Education.

7.141 We consider it appropriate to report learners who go missing from school to both the Police and children's social care where the learner cannot be located promptly by parents, carers or school staff.

7.142 he DSL, Attendance Lead and Senior Leadership Team regularly review attendance data to identify learners who may be at increased safeguarding risk.

7.143 Attendance concerns are considered alongside safeguarding, welfare, behaviour, SEND and academic information to ensure learners receive appropriate support at the earliest opportunity. Persistent absence, severe absence and patterns of lateness are recognised as potential indicators of unmet need, abuse, neglect or exploitation and will be investigated appropriately.

7.144 The DSL will routinely triangulate attendance, behaviour, safeguarding, SEND and welfare information to identify emerging safeguarding concerns.

7.145 As an independent special school, we recognise that attendance difficulties may be linked to SEND, anxiety, emotional wellbeing, medical needs, sensory differences, communication needs or adverse childhood experiences. Attendance concerns will therefore be considered alongside the learner's wider needs and vulnerabilities and addressed through a coordinated safeguarding, pastoral and educational response.

7.146 Elective Home Education (EHE)

80. We recognise that many children who are electively home educated receive a positive and suitable education. Parents have the right to educate their children at home where this is their informed decision and where suitable education can be provided.

7.147 However, we also recognise that Elective Home Education (EHE) can result in some children becoming less visible to professionals and services that support their education, welfare and safeguarding needs. We will therefore carefully consider the safeguarding implications of any proposal to electively home educate.

7.148 In accordance with the Education (Pupil Registration) (England) Regulations 2006, the school will notify Telford & Wrekin Council whenever a learner's name is removed from the admission register in circumstances that require notification to the local authority.

7.149 We will follow the Telford & Wrekin Local Authority Elective Home Education Policy and associated procedures.

7.150 Where a parent provides written notification of their intention to electively home educate their child, or expresses an interest in doing so, the school will arrange a Multi-Agency Meeting (MAM) at a mutually convenient time involving parents and relevant professionals, in accordance with KCSIE guidance.

7.151 The school will lead the meeting and ensure appropriate representation from senior leaders and relevant professionals. The EHE Team will prioritise attendance where a child:

- is subject to a Child Protection Plan;
- is a Child in Need; or
- has an allocated social worker.

7.152 Requests for attendance at other meetings will be considered on a case-by-case basis.

7.153 The school will complete and submit all required MAM documentation, including:

- Part 1 of the MAM form before the meeting;
- Part 2 of the MAM form following the meeting; and
- a copy of any deregistration letter where one has been received.

7.154 It remains the responsibility of the school to ensure the required paperwork is completed and submitted.

7.155 Where parents intend to electively home educate their child or children, we will work with the local authority EHE Team and other relevant agencies to consider, plan for and support the child's ongoing safeguarding, welfare and educational needs.

7.156 We recognise our responsibility to identify parents or carers who should be offered a discussion regarding Elective Home Education before a final decision is made.

7.157 Where parents decline to attend such a meeting, this will be recorded. The school will nevertheless continue to engage with the local authority and any relevant professionals to ensure that safeguarding and welfare considerations have been appropriately explored.

7.158 Children Who Need a Social Worker (Child in Need and Child Protection Plans)

7.159 Children may require a social worker due to safeguarding and welfare concerns. This may arise because of abuse, neglect, exploitation, adverse childhood experiences or complex family circumstances. Experiences of adversity and trauma can leave children vulnerable to further harm and may create barriers to attendance, learning, behaviour, emotional wellbeing and mental health.

7.160 Local authorities should share information regarding children who have a social worker. The DSL will hold and use this information to support decision-making in the best interests of the child's safety, welfare and educational outcomes.

7.161 Where a child has a social worker, this information will be used by the DSL or Deputy DSLs to inform safeguarding decisions, including responses to unauthorised absence, missing education and known safeguarding risks. The information will also be used to promote welfare by helping identify and coordinate appropriate pastoral, educational and safeguarding support alongside statutory services.

7.162 Children Requiring Mental Health Support

7.163 We recognise that we have an important role to play in supporting the mental health and wellbeing of our learners.

7.164 We will help prevent mental health concerns by promoting resilience through our whole-school approach to social, emotional and mental wellbeing, which is tailored to the needs of our learners.

7.165 All staff understand that mental health concerns can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other safeguarding concerns.

7.166 Staff recognise that mental health difficulties may, in some circumstances, develop into safeguarding concerns. These may include self-harm, suicidal ideation or suicide risk. Mental health concerns may also indicate that a child is experiencing abuse, neglect or exploitation. Staff understand that only appropriately trained professionals should diagnose a mental health condition.

7.161 Staff are alert to changes in children's behaviour, presentation and wellbeing and will identify those whose behaviour suggests they may be experiencing a mental health concern or be at risk of developing one.

7.162 As an independent special school, we recognise that learners with SEND may communicate emotional distress, anxiety, trauma or mental health difficulties in different ways. Staff will consider changes in behaviour, communication, emotional regulation, engagement, physical wellbeing, presentation and participation as possible indicators that additional support, intervention or safeguarding action may be required.

7.163 Staff are alert to signs that may indicate a child is struggling with their mental health, including:

- significant changes in behaviour;
- ongoing difficulties with sleep;
- withdrawal from social situations;
- loss of interest in activities they would ordinarily enjoy;
- deterioration in presentation or self-care;
- physical signs of self-harm; and
- signs of emotional distress or neglect.

7.164 Staff understand that not every child displaying these signs will be experiencing a mental health difficulty or suicidal thoughts. However, recognising these indicators enables early identification, support and intervention.

7.165 We will ensure that any intervention offered is evidence-informed, safe, effective and appropriate to the child's age, developmental stage, needs and level of risk.

7.166 If staff have concerns about a child's mental health that also amount to a safeguarding concern, they must follow the safeguarding procedures within this policy and inform the DSL or a Deputy DSL immediately.

7.167 If staff believe a child is at immediate risk of harm, they should call 999 or ensure the child receives urgent medical assessment through A&E with support from a parent, carer or another appropriate adult.

7.168 Where urgent mental health support is required but the situation is not an emergency, staff may seek support through NHS 111 and select the mental health option.

7.169 We recognise that only appropriately trained professionals should attempt to diagnose a mental health condition.

7.170 Where a learner has an identified mental health need, we will implement an individual safety plan where appropriate.

7.171 Safety plans will:

- take account of the learner's communication profile, developmental needs and SEND;
- identify known risks and protective factors;
- identify support strategies and interventions;
- involve the learner, family and relevant professionals where appropriate; and
- be kept under regular review.

7.172 We will draw upon guidance and resources including:

- Young Minds: *Self-Harm Advice and Support*;
- Anna Freud: *Self-Care Resources*; and
- Every Life Matters: *Safety Planning Guidance*.

7.173 We recognise that abuse, neglect, exploitation and other adverse childhood experiences can have a significant and lasting impact on children's mental health, behaviour, relationships and educational outcomes. Staff will be supported to understand the impact of trauma and adversity and respond appropriately.

7.174 As with medical conditions, we will seek confirmation of any reported mental health diagnosis from an appropriately qualified professional where a diagnosis is self-reported or reported by a parent or carer.

7.175 We will follow the Department for Education guidance *Mental Health and Behaviour in Schools*.

7.176 Our Senior Mental Health Lead is Dr Brad Crook. Dr Crook is a member of the Senior Leadership Team. The member of the Senior Leadership Team who supports the Senior Mental Health Lead is Rachel Hawley.

7.177 Staff should also refer to the school's Mental Health and Wellbeing Policy.

7.178 Suicide Intervention

7.179 We recognise that thoughts of suicide can affect children and young people and that suicide remains one of the leading causes of death among young people in the United Kingdom.

7.180 We will work with our learners, families and partner agencies to support anyone within our community who may be experiencing suicidal thoughts or behaviours. Any disclosure, concern or indication of self-harm, suicidal ideation or suicide risk will be treated as a safeguarding concern and responded to immediately in accordance with safeguarding procedures and the school's Suicide Intervention Policy.

7.181 We will follow our Suicide Intervention Policy to support the safety and wellbeing of those in our care and will signpost staff to recognised awareness and training resources, including the Zero Suicide Alliance.

7.182 Looked After Children and Previously Looked After Children

7.183 We recognise that abuse and neglect are the most common reasons why children become looked after. All staff have the knowledge and skills required to safeguard looked after children.

7.184 The DSL will maintain details of each child's social worker and the relevant Virtual School Head. The DSL is responsible for ensuring that staff have the information they need regarding:

- a child's looked after status;
- care arrangements;
- delegated authority arrangements;
- contact arrangements with birth parents or those with parental responsibility; and
- the child's educational needs and support arrangements.

7.185 The DSL and Designated Teacher will work together to ensure that safeguarding, wellbeing, attendance, attainment and progress are effectively supported, including for children living in kinship care arrangements.

7.186 We recognise that previously looked after children may remain vulnerable. We will work closely with all relevant agencies to ensure that appropriate safeguarding support is provided and that concerns are responded to promptly.

7.187 The Designated Teacher

7.188 The Proprietor appoints Lorna Deakin and Peter Smith as Designated Teachers to promote the educational achievement of registered learners who are looked after.

7.189 In accordance with the Children and Social Work Act 2017, Designated Teachers also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship orders, child arrangements orders or who were adopted from state care outside England and Wales.

7.190 The Designated Teachers have appropriate training, qualifications and experience to fulfil this role effectively.

7.191 We will follow the statutory guidance *The Roles and Responsibilities of the Designated Teacher*.

7.192 Virtual School Heads and Kinship Care

7.193 As an independent special school, the Designated Teachers will work closely with the Virtual School Head to ensure that appropriate support is in place for looked after children and that their Personal Education Plans are implemented effectively. We will follow the statutory guidance *Promoting the Education of Looked After Children*.

7.194 As an independent special school, we have appropriately trained staff who take the lead in working with Virtual School Heads to promote the educational achievement, attendance, wellbeing and progress of looked after and previously looked after children.

7.195 We recognise that Virtual School Heads also have a non-statutory responsibility to promote the educational achievement of children living in kinship care arrangements and understand the important contribution this makes to safeguarding and educational outcomes.

7.196 We will work with the Virtual School Head in accordance with the non-statutory guidance *Promoting the Education of Children with a Social Worker and Children in Kinship Care Arrangements* to ensure that learners receive appropriate support and that their needs are reflected within safeguarding, pastoral and educational planning.

7.197 The DSL, Headteacher, Designated Teachers, SENDCo, Senior Mental Health Lead, SAS and relevant leaders will work collaboratively with the Virtual School Head to promote the attendance, attainment, progress and wellbeing of children who have a social worker.

7.198 The Virtual School Head for Telford and Wrekin is Michelle Salter.

7.199 Care Leavers (Post-16)

7.200 The DSL understands the ongoing responsibilities of local authorities towards young people who cease to be looked after and become care leavers. The DSL will maintain details of the local authority Personal Adviser appointed to support the care leaver and will liaise with them, and other relevant professionals, where concerns arise regarding the young person's welfare, safeguarding, attendance, wellbeing or educational progress.

7.201 Children Who Have Special Educational Needs and Disabilities (SEND) or Health Issues

7.202 As an independent special school, we recognise that learners with SEND, communication needs and health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, neglect and exploitation.

7.203 We recognise that barriers to identifying safeguarding concerns may include:

- assumptions that indicators of abuse, neglect or exploitation relate solely to a learner's disability, health need or diagnosis;
- increased vulnerability to social isolation and exclusion;
- a greater likelihood of being disproportionately affected by bullying, discrimination or child-on-child abuse;
- communication barriers that may make it more difficult for learners to recognise, understand or report concerns;
- difficulties understanding relationships, consent, personal boundaries and risk; and
- challenges in expressing worries, anxieties or experiences of harm.

7.204 To help address these additional challenges, we provide enhanced pastoral, safeguarding and therapeutic support for learners where appropriate.

7.205 For any safeguarding concerns involving learners with SEND, the DSL, Deputy DSLs, SENDCo and relevant professionals will work closely together to ensure risks are understood, appropriate support is provided and safeguarding plans are responsive to individual needs.

7.206 Safeguarding approaches, reporting systems and support arrangements will be adapted wherever necessary to ensure they are accessible, meaningful and effective for all learners.

7.207 Children Questioning Their Gender

7.208 The school will keep this section under continual review and will update procedures in line with any revised statutory guidance, case law, Department for Education advice or Equality and Human Rights Commission guidance.

7.209 We recognise that some children and young people may question their gender and may seek support from trusted adults within the school. We will respond to all learners with sensitivity, dignity, respect and professionalism, whilst ensuring that safeguarding responsibilities remain paramount. We will act in accordance with KCSIE 2026 and all relevant legislation.

7.210 Staff understand that children questioning their gender may experience vulnerabilities including mental health difficulties, emotional distress, family difficulties, peer relationship challenges, social isolation or discriminatory bullying. Staff will remain professionally curious and consider the full range of factors affecting the child's wellbeing.

7.211 Staff will not initiate discussions or actions relating to social transition. Where a learner or parent/carer requests support relating to social transition, the request will be considered individually through a safeguarding-led process. Decisions will be made with regard to safeguarding, equalities legislation, human rights legislation and the welfare of the learner, other learners and the wider school community.

7.212 The DSL will be involved in considering any request relating to social transition and appropriate records will be maintained. In most circumstances, parents/carers will be involved at the earliest opportunity, and their views will be given significant weight. Where involving parents/carers may place a child at risk of harm, safeguarding procedures will be followed and advice sought from relevant agencies.

7.213 We recognise that social transition is an active intervention. Any request for support will therefore be considered carefully and on an individual basis, taking account of:

- safeguarding considerations;

- the child's wishes and views;
- parental views;
- relevant professional advice;
- the child's best interests; and
- the impact on others within the school community.

7.214 Arrangements will be reviewed regularly and amended where circumstances change.

7.215 We are committed to preventing and responding to all forms of bullying, harassment and discrimination. Any bullying related to gender questioning, gender expression, sex, disability, race, religion, sexual orientation or any protected characteristic will be taken seriously and addressed promptly in accordance with our Behaviour Policy and Anti-Bullying Policy.

7.216 Records relating to learners will accurately reflect biological sex where this is required for safeguarding, legal and statutory purposes. Information will only be shared on a need-to-know basis and in accordance with safeguarding and data protection requirements.

7.217 Access to toilets, changing facilities and participation in single-sex activities will be managed in accordance with safeguarding duties, legal requirements and KCSIE 2026.

7.218 Where a learner wishes to reverse or amend previously agreed arrangements relating to social transition, the school will work with the learner, parents/carers and relevant professionals to review support and safeguarding arrangements.

7.219 All requests relating to social transition will be supported by an appropriate risk assessment and safeguarding process led by the DSL. Decision-making, professional advice, parental involvement and review arrangements will be recorded appropriately.

7.220 Our RSHE curriculum promotes equality, respect, kindness and an understanding of the law. It reflects the diversity of modern society and our school community, including LGBT people, in accordance with RSHE Statutory Guidance and the Equality Act 2010.

7.221 Legal Definition of Sex and Equality Act Compliance

7.222 In accordance with the Equality Act 2010 and relevant case law and statutory guidance, the school will ensure that decisions relating to safeguarding, facilities, record keeping and educational provision are made lawfully and with due regard to privacy, dignity, safety and the rights of all learners.

7.223 Where single-sex facilities, activities or provisions are offered, decisions will be made in accordance with legal requirements, safeguarding responsibilities and the needs of the individual circumstances. The school remains committed to supporting all learners with sensitivity, respect and professionalism.

7.224 Staff

7.225 All staff, volunteers, supply staff, contractors and visitors are informed of the identity of the DSL and Deputy DSLs and understand safeguarding procedures, including how to recognise concerns, respond to disclosures, record concerns and make referrals.

7.226 Staff should not accept invitations to visit learners' homes unless authorised by the Headteacher and undertaken as part of a professional responsibility. Such arrangements will be considered on a case-by-case basis and risk assessed where appropriate.

7.227 Where confidential or one-to-one meetings are necessary, they should take place in locations where suitable visibility, transparency and safeguarding arrangements exist. Staff should ensure that another adult is aware that the meeting is taking place.

7.228 Parents and Carers

7.229 Parents and carers play an important role in safeguarding children. The safety and welfare of the child will always be our primary consideration. Where safeguarding concerns arise, professional advice may be sought before parents are informed. Wherever possible, we will work openly and collaboratively with parents and carers to support their child's welfare.

7.230 In line with *Working Together to Safeguard Children 2026*, we seek to build positive, trusting and respectful relationships with families. Effective safeguarding is most

successful when schools, families and partner agencies work together to promote children's wellbeing and protect them from harm.

7.231 We are transparent about our curriculum, including RSHE provision, and provide opportunities for parents and carers to discuss any concerns. This policy is available to all parents and carers through the school's website and other appropriate channels.

7.232 Parents and carers who have concerns regarding a member of staff should raise these concerns with the Headteacher in the first instance. Where concerns relate to the Headteacher, the Proprietor should be contacted.

7.233 Parents and carers may also contact the Independent Schools Inspectorate (ISI) regarding regulatory concerns. Information can be found at:

https://www.isi.net/parents-and-pupils/concerns-about-a-school

or by contacting ISI directly.

7.234 All complaints will be managed in accordance with the school's Complaints Procedure.

7.235 We will keep parents informed of safeguarding developments, policy updates and relevant child protection information through our usual communication channels.

7.236 We expect all members of the school community to communicate respectfully and constructively. Where behaviour towards staff, learners or visitors is unacceptable, appropriate action may be taken, including restricting access to the school site where necessary.

7.237 The school site is private property. We will take appropriate action to ensure it remains a safe environment for learners, staff, families and visitors. Members of the public do not have an automatic right of entry.

7.238 We encourage parents and carers to raise concerns with the school in the first instance so that issues can be addressed promptly and fairly through established procedures. We discourage the use of social media to pursue complaints before the school has had an opportunity to investigate and respond.

7.239 Changing in School

7.240 We will ensure suitable arrangements are in place for learners changing for physical education, swimming, educational visits and other activities where changing facilities are required.

7.241 Our practice is informed by NSPCC guidance on changing rooms and takes account of:

- safeguarding and welfare considerations;
- privacy and dignity;
- staff supervision arrangements;
- the needs of learners with SEND;
- medical and personal care requirements;
- individual risk assessments;
- off-site changing facilities; and
- participation in performances, productions and extracurricular activities.

7.242 Arrangements will be proportionate, age-appropriate and responsive to the individual needs of learners, ensuring that all learners feel safe, respected and supported.

8.0 Part Three: Safer Recruitment

8.1 The school will comply with all safer recruitment requirements set out within Keeping Children Safe in Education 2026, Part Three: Safer Recruitment.

8.2 The school commissions [insert HR provider name] to provide professional advice and support in relation to safer recruitment, employment procedures, safeguarding requirements and workforce compliance.

8.3 Further information can be found within the school's Safer Recruitment Policy and Procedures.

8.4 Recruitment and Selection Process

8.5 We are committed to creating and maintaining a culture that safeguards and promotes the welfare of children and young people.

8.6 As part of this commitment, we operate robust recruitment and selection procedures that are designed to deter, identify and reject unsuitable individuals from working with children.

8.7 All recruitment processes are conducted in accordance with KCSIE 2026 and include:

- safeguarding-focused job descriptions and person specifications;
- safeguarding statements within advertisements;
- scrutiny of application forms and employment history;
- exploration of gaps in employment;
- verification of identity, qualifications and employment history;
- references obtained and reviewed before appointment wherever possible;
- appropriate DBS and barred list checks;
- prohibition checks where applicable;
- overseas checks where required;
- online searches as part of due diligence; and
- maintenance of an accurate Single Central Record.

8.8 As an independent special school supporting learners with complex needs, we recognise the importance of recruiting staff who demonstrate the skills, values and professional behaviours necessary to safeguard vulnerable learners effectively.

8.9 We will ensure that all individuals involved in recruiting staff have received appropriate safer recruitment training. At least one member of every interview panel will have completed accredited safer recruitment training.

8.10 The following members of staff have completed safer recruitment training:

- Bev Doran
- Anita Brown
- Paul Bliss
- Dee Marshall

- Mandy Peever
- Lorna Deakin

8.11 Pre-Appointment Vetting Checks, Regulated Activity and Recording Information

8.12 We will comply with all legal requirements relating to the appointment of individuals engaged in regulated activity with children.

8.13 Appropriate pre-appointment checks will be undertaken before an individual begins work. These checks help determine whether an individual is suitable to work with children and whether any legal restrictions prohibit them from doing so.

8.14 Safer recruitment forms part of a wider safeguarding culture and continues throughout an individual's employment with the school.

8.15 Additional Checks for Staff, Volunteers and Others

8.16 We will undertake all checks required by KCSIE 2026 for:

- staff;
- volunteers;
- agency and third-party staff;
- contractors;
- trainee teachers;
- proprietors;
- SAS members;
- individuals who have lived or worked overseas; and
- any other individual working in school where checks are required.

8.17 We will also fulfil our safeguarding responsibilities in relation to work experience placements, host families and any alternative educational provision where applicable.

8.18 Visitors

8.19 We receive a range of visitors including educational professionals, therapists, contractors, maintenance personnel, parents, family members and other authorised visitors.

8.20 DBS checks will not routinely be sought for visitors attending one-off events, performances, meetings or family activities. Professional judgement will be exercised regarding the level of supervision required.

8.21 Visitors attending in a professional capacity will be required to provide identification and the school will seek appropriate assurance that relevant safeguarding checks have been completed by their employer.

8.22 The school will carefully assess the suitability of external speakers, organisations and service providers before they work with learners. Appropriate consideration will be given to safeguarding, Prevent duties, age appropriateness, educational value and reputational risk.

8.23 Alternative Provision

8.24 Where the school commissions or arranges alternative provision, responsibility for safeguarding remains with the school.

8.25 Written confirmation will be obtained from the provider that all required safeguarding and recruitment checks have been completed. The school will monitor placements to ensure learners remain safe and that provision continues to meet their needs.

8.26 Adults Supervising Learners on Work Experience

8.27 There work experience placements are arranged, we will ensure that the provider has suitable safeguarding arrangements in place.

8.28 We will assess whether DBS and barred list checks are required based upon:

- the learner's age;
- the nature of supervision;
- frequency of contact; and

- whether the activity constitutes regulated activity.

8.29 Decisions regarding safeguarding checks for work experience placements will be made in accordance with KCSIE 2026 and relevant DBS guidance.

8.30 Private Fostering

8.31 We recognise that a private fostering arrangement occurs when a child under 16 years of age (or under 18 if disabled) is cared for and accommodated by someone who is not a parent, person with parental responsibility or close relative for 28 days or more.

8.32 Staff are aware that private fostering arrangements may come to light through normal contact with learners and families.

8.33 Where the school becomes aware of a potential private fostering arrangement, we will encourage parents and carers to notify Children's Social Care and will share information with the local authority where appropriate in accordance with safeguarding procedures.

8.34 The school's Single Central Record is maintained by Bev Doran and is subject to regular monitoring by senior leaders and the Proprietor to ensure compliance with KCSIE 2026 and the Independent School Standards. Our ongoing safeguarding of children and the legal reporting duties on us

8.35 We understand the importance of safeguarding vigilance beyond the recruitment process.

8.36 We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to ensure the safety and welfare of children is embedded in all of our processes and procedures and consequentially enshrined in our ethos.

8.37 We aim to promote continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

8.38 We aim to create the right culture and environment so that our staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can help assist us as employers to support staff, where there is a need, and help them manage children's safety and welfare. Potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in our care.

8.39 We will undertake our duty to refer to the Disclosure and Barring Service and to the Teaching Regulation Agency where required.

Appendix A:

Protective Security and Preparedness

This appendix outlines how Overley Hall School aligns with the Department for Education's guidance on *Protective Security and Preparedness for Education Settings* and sets out the arrangements in place to protect learners, staff, visitors and contractors.

As an independent special school, we recognise that many of our learners have complex needs including autism, attachment difficulties, sensory processing differences, communication needs and learning disabilities. These factors can significantly affect how learners perceive and respond to emergencies. Security planning therefore takes account of learners' individual needs, vulnerabilities and levels of understanding.

Protective security is an integral part of safeguarding and promoting the welfare of learners and forms part of the school's wider safeguarding, health and safety and business continuity arrangements.

A. Embedding a Security Culture

Overley Hall School promotes a whole-school approach to security awareness and preparedness.

We aim to:

- maintain a safe and secure learning environment;
- develop a culture of vigilance and shared responsibility;
- ensure all staff understand their role during emergencies;
- embed security within safeguarding practice;
- review risks regularly; and
- ensure emergency arrangements reflect the needs of our learner population.

All staff receive training and updates relating to:

- emergency procedures;
- evacuation procedures;

- invacuation procedures;
- lockdown arrangements;
- RUN HIDE TELL principles;
- safeguarding responsibilities;
- security awareness; and
- critical incident management.

Because learners may experience heightened anxiety during unexpected events, staff work proactively to establish strong, trusting relationships and ensure emergency procedures are practised regularly and delivered in a way that is meaningful and accessible.

B. Staff Roles in Protective Security

The Headteacher, Bev Doran, is the school's Designated Security Lead and has overall responsibility for protective security and preparedness arrangements.

The Designated Security Lead is responsible for:

- developing and maintaining security policies and procedures;
- reviewing risks and vulnerabilities across the site;
- ensuring appropriate staff training is completed;
- overseeing drills and emergency exercises;
- coordinating responses during incidents;
- liaising with emergency services; and
- ensuring emergency grab kits remain current and accessible.

In most incidents, the Designated Security Lead will also act as the Incident Lead.

In the absence of the Headteacher, responsibilities may be delegated to Dee Marshall, Assistant Headteacher.

All staff, including teachers, support staff, therapists, administration staff, domestic staff and contractors, are expected to understand their role in maintaining security and responding to emergencies.

C. Tailoring Emergency Plans to the Setting

Emergency procedures are specifically designed around the needs of Overley Hall School and take account of:

- the physical layout of the school;
- woodland and outdoor learning areas;
- communication needs;
- SEND vulnerabilities;
- sensory processing differences;
- behaviour and emotional regulation needs;
- medication requirements;
- learner risk assessments;
- Positive Support Plans (PSPs); and
- Personal Emergency Evacuation Plans (PEEPs).

We recognise that some learners may:

- struggle to understand danger;
- have difficulty following instructions during periods of anxiety;
- abscond when distressed;
- become dysregulated during emergencies; or
- require significant adult support to remain safe.

Emergency plans are reviewed annually and following drills, exercises or real incidents.

D. RUN HIDE TELL Principles

All staff and regular contractors are familiar with the national RUN HIDE TELL guidance and understand their responsibilities during a serious security incident.

Because of the complex needs of our learners, staff take responsibility for:

- directing learners to safety;

- adapting instructions appropriately;
- maintaining calm and reassurance;
- supporting learners who may be unable to independently respond to danger; and
- implementing agreed emergency procedures.

Learners receive age-appropriate and developmentally appropriate support to understand emergency safety procedures.

Lockdown and invacuation procedures incorporate RUN HIDE TELL principles where appropriate.

E. Grab Kits

Emergency grab kits are maintained across the school site and are available for use during emergencies, evacuations and major incidents.

Grab kits include:

- site maps and plans;
- learner emergency contact details;
- attendance registers;
- visitor information;
- medication information;
- communication equipment;
- PEEPs;
- Positive Support Plans;
- emergency procedures;
- first aid resources;
- bomb threat checklists; and
- information required by emergency services.

The Designated Security Lead is responsible for ensuring grab kits are reviewed, updated and replenished as required.

F. Communication During an Incident

The school maintains clear communication arrangements during emergency situations.

Communication may take place through:

- two-way radio systems;
- mobile telephones;
- emergency services communication channels;
- email systems;
- emergency contact arrangements; and
- direct communication with parents, carers and professionals.

The Headteacher or designated Incident Lead will act as the primary point of contact with emergency services.

Parents, carers and social workers will be informed as soon as practicably possible.

Where emergency services are responding to an incident, parents and carers may be asked not to attend the school site until instructed to do so.

G. Post-Incident Welfare and Review

Following any significant incident, the welfare and emotional wellbeing of learners and staff will be prioritised.

Support may include:

- pastoral support;
- therapeutic support;
- safeguarding support;
- debriefing sessions;
- counselling provision where appropriate;
- communication with families; and
- referrals to specialist services.

Recognising the needs of our learner population, the school understands that some learners may experience prolonged anxiety, emotional distress or dysregulation following emergency situations.

Following drills and incidents, leaders will undertake a formal review of procedures and identify any lessons learned.

Findings will be shared with:

- the Education Management Team;
- the Support and Scrutiny Team;
- the Managing Director; and
- the Proprietor where appropriate.

H. Training and Resources

All staff receive training and updates relevant to their role.

This includes:

- safeguarding training;
- emergency response procedures;
- evacuation procedures;
- invacuation procedures;
- lockdown procedures;
- fire awareness training;
- fire warden training where applicable;
- Positive Behaviour Support approaches;
- critical incident response; and
- ACT for Education and security awareness training where appropriate.

The school undertakes:

- termly evacuation drills;
- lockdown drills at least twice annually;
- regular reviews of emergency arrangements; and

- ongoing evaluation of preparedness and security measures.

Protective security arrangements form part of the annual safeguarding review undertaken by senior leaders, the Support and Scrutiny Team and the Proprietor.

Additional Site-Specific Arrangements

Designated Fire Wardens

The school's designated Fire Wardens are:

- Bev Doran
- Dee Marshall
- Mandy Peever
- Peter Smith
- Lorna Deakin

Designated Safe Rooms

Identified safe rooms for invacuation and lockdown situations include:

- Staff Room
- Therapy Room
- Conference Room
- Headteacher's Office
- Ash Classroom
- Oak Classroom
- Lavender Classroom
- Rose Classroom
- Cinema Room
- Store Cupboard (Coach House)
- Main Hall Cellar

These locations are reviewed regularly as part of the school's emergency planning arrangements.

Review of Preparedness

Protective security, emergency preparedness, lockdown procedures, invacuation arrangements, evacuation records and emergency response arrangements are reviewed annually by the Headteacher in collaboration with the Education Management Team, Support and Scrutiny Team, Managing Director and Proprietor, and updated following any significant incident, drill or change in statutory guidance.