

Part of the Branches Education Group



SAFEGUARDING AND CHILD PROTECTION POLICY



Approved By	Rebecca Warhurst	Head Teacher	Aug 2026
Amendments Made	See Below		
Linked Policies	• Staff Code of Conduct • Recruitment and Selection of Staff • Managing Allegations Against Staff, (including procedures for managing Low Level Concerns) • Whistleblowing Policy • Complaints Procedure • Anti-Bullying Policy • Behaviour, Rewards and Sanctions Policy • Data Protection • Online Safety		
Signed	<i>R. Warhurst</i>	Head Teacher	Aug 2026
	<i>L De - Naves</i>	Governance Chair	Aug 2026
Date Next Review	August 2027		

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1.0 INTRODUCTION, DEFINITIONS and KEY ROLES

1.1 Introduction

Branches Education Group are committed to the safety and protection of all children and young people attending one of our schools. A primary focus is on providing a safe and caring environment in which children and young people can develop socially, emotionally and academically, safe from fear and harm.

This policy is one of a series of documents and policies relating to safeguarding, including:

- Staff Code of Conduct
- Recruitment and Selection of Staff
- Managing Allegations Against Staff, (including procedures for managing Low Level Concerns)
- Whistleblowing Policy
- Complaints Procedure
- Anti-Bullying Policy
- Behaviour, Rewards and Sanctions Policy
- Data Protection
- Online Safety

Every member of staff within Branches Education Group has a shared responsibility for safeguarding and there are specific roles in relation to safeguarding children at our school.

Safeguarding is a golden thread, permeating through all aspects of life at The Willows School and as such, it is *everyone's* responsibility. Our school forms part of a broader system of safeguarding and protection for children. Our approach is child-centred, which means that:

- our safeguarding procedures consider the wishes, feelings and best interests of children
- we seek to give children a 'voice', listen to what they say, take them seriously and work collaboratively with others to meet their needs

Our school aims to provide a positive, stimulating, caring and safe environment, which promotes the social, emotional, physical and moral development of each pupil. We work hard to maintain an ethos and strong culture of safeguarding so that children feel safe and can be safe both at school, and on the way to and from school.

Where a pupil is educated off-site, including in any alternative provision, we as a school continue to be responsible for the safeguarding of that pupil.

This policy applies to everyone in our school and must be read alongside policies and documents listed above.

All staff, including temporary staff, volunteers, governors, trustees and those who do not work directly with children, will receive safeguarding and child protection training at induction and regular updates thereafter. All staff are required to read and understand Part One of Keeping Children Safe in Education 2026. The school will maintain records demonstrating compliance with these requirements

1.2 Definitions

Child(ren) means everyone under the age of 18 years.

Working Together to Safeguard Children (2026) defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge

- protecting children from maltreatment, whether occurring inside or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding incorporates child protection but is much broader than this. Safeguarding is everyone's responsibility, and all staff are aware of our collective responsibility to identify concerns early, provide help and support, and take appropriate action to protect children from harm. Schools should adopt a child-centred approach and work in partnership with safeguarding agencies, children and their families.

All staff are aware that safeguarding issues can manifest in many ways and understand their responsibility to protect children from potential sources and types of harm, including:

- physical abuse
- emotional abuse
- sexual abuse
- neglect
- child criminal exploitation (CCE), including county lines
- child sexual exploitation (CSE)
- serious violence
- bullying, including cyberbullying and prejudice-based bullying
- peer-on-peer (child-on-child) abuse
- sexual violence and sexual harassment between children
- harmful sexual behaviour
- domestic abuse, including controlling and coercive behaviour
- online abuse and online safety risks
- cybercrime
- abuse facilitated through technology, including artificial intelligence (AI)
- sharing, possessing or creating nude or semi-nude images/videos
- grooming and online exploitation
- misinformation, disinformation and conspiracy-based online harms
- radicalisation and extremism
- hate crime and discriminatory abuse
- racism and race-related abuse
- homophobic, biphobic and transphobic abuse
- disability-based abuse
- violence against women and girls (VAWG), including misogyny
- gender-based violence
- stalking and harassment
- modern slavery
- human trafficking
- gang affiliation and youth violence
- substance misuse
- mental health concerns where these may be an indicator of abuse, neglect or exploitation
- children missing education (CME)
- children absent from education
- elective home education concerns
- private fostering arrangements
- honour-based abuse (HBA), including:
 - female genital mutilation (FGM)
 - forced marriage
 - breast ironing/breast flattening
- fabricated or induced illness (FII)
- perplexing presentations (PP)

- poor parenting, particularly in relation to babies and young children
- risks associated with looked-after children, previously looked-after children, children in kinship care and children with special educational needs and disabilities (SEND)
- contextual safeguarding risks occurring outside the family home, including within peer groups, schools, communities and online environments

Staff recognise that children may experience multiple vulnerabilities and harms simultaneously and that safeguarding concerns can occur both online and offline. All concerns will be taken seriously and acted upon in accordance with the school's safeguarding and child protection procedures.

1.3 Framework Underpinning this Policy

This policy and its procedures have been developed in accordance with the safeguarding and child protection arrangements established by the local Children's Safeguarding Assurance Partnership (CSAP) and will be implemented alongside local multi-agency safeguarding procedures.

This policy has been written having regard to the statutory guidance and legislation currently in force, including but not limited to:

- Keeping Children Safe in Education 2026 (KCSIE 2026), Department for Education (effective from 1 September 2026)
- Working Together to Safeguard Children 2026 statutory guidance
- The Children Act 1989
- The Children Act 2004
- The Education Act 2002 (Section 175 and Section 157)
- The Education and Inspections Act 2006
- The Safeguarding Vulnerable Groups Act 2006
- The Children and Social Work Act 2017
- The Equality Act 2010
- The Counter-Terrorism and Security Act 2015 (Prevent Duty)
- The Domestic Abuse Act 2021
- The Human Rights Act 1998
- The Data Protection Act 2018 and UK GDPR
- The School Staffing (England) Regulations 2009, as amended
- The Education (Independent School Standards) Regulations 2014 (where applicable)
- The Childcare Act 2006
- The Non-Maintained Special Schools (England) Regulations 2015 (where applicable)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE)
- The Prevent Duty Guidance: England and Wales
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Statutory Guidance
- Working Together to Improve School Attendance (statutory guidance)
- Guidance relating to online safety, filtering and monitoring, children missing education, alternative provision, elective home education, children with special educational needs and disabilities (SEND), and safeguarding pupils who are absent from education.

This policy should be read alongside all other school policies and procedures relating to safeguarding, child protection, behaviour, staff conduct, online safety, attendance, anti-bullying, whistleblowing, recruitment, SEND, equality, health and safety, and information sharing. Safeguarding practice will be reviewed regularly to ensure continued compliance with statutory requirements and local safeguarding partnership arrangements

1.4 Named staff who have specific responsibility for Child Protection

Designated Safeguarding Lead: Rebecca Warhurst

Deputy Designated Safeguarding Lead Gemma Foster

Training for Designated Staff in the school - The Designated Safeguarding Lead (DSL) and any Deputy DSLs will undertake appropriate safeguarding and child protection training at least every two years. In addition, they will update their knowledge and skills at regular intervals, and at least annually, to keep up with developments in safeguarding practice, legislation, statutory guidance, local safeguarding arrangements and emerging risks to children. This training will equip the DSL and deputies with the knowledge and skills necessary to carry out their roles effectively, including understanding local multi-agency safeguarding arrangements, child protection procedures, information sharing, online safety, child-on-child abuse, early help and family help processes, contextual safeguarding, and safeguarding concerns relating to children with additional vulnerabilities.

1.5 Roles and Responsibilities for Safeguarding

The school recognises its responsibility to provide a safe, inclusive and supportive environment in which children can learn, develop and thrive. Safeguarding and promoting the welfare of children is everyone's responsibility, and all staff, governors, trustees, volunteers and contractors have a role to play in protecting children from harm and acting in their best interests. Staff should maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in a child's best interests.

All staff have a responsibility to identify children who may benefit from early help, family help, safeguarding support or child protection intervention, and to take appropriate action in accordance with this policy and local safeguarding procedures. Staff should be alert to indicators of abuse, neglect, exploitation and other safeguarding concerns, both online and offline, and should record and report concerns promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL.

The school adopts a child-centred approach to safeguarding and recognises that effective safeguarding requires information sharing, professional curiosity and effective multi-agency working. No single practitioner can have a full picture of a child's needs and circumstances, and therefore all staff must contribute to safeguarding assessments and interventions where appropriate.

School staff are not responsible for investigating allegations or determining whether abuse has occurred. This is the responsibility of Children's Social Care, the Police and other statutory safeguarding agencies. However, all staff have a duty to recognise, respond to, record and report concerns without delay, and to work collaboratively with safeguarding partners to support children and families. Staff should never assume that another person has taken action and must follow the school's procedures if they have concerns that a child may be at risk of harm.

The school acknowledges that safeguarding concerns may arise from a child's home environment, peer relationships, community, online activity or wider contextual factors. Staff will remain vigilant to emerging safeguarding risks, including child-on-child abuse, child criminal exploitation, child sexual exploitation, serious violence, domestic abuse, radicalisation, online harms, AI-enabled abuse and violence against women and girls (VAWG).

People with specific safeguarding responsibilities

a)The Proprietor

The Proprietor recognises and fulfils its statutory responsibilities under Section 11 of the Children Act 2004, Section 157 of the Education Act 2002, the Independent School Standards Regulations (where applicable), Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). The Proprietor is responsible for ensuring that appropriate safeguarding and child protection policies, procedures and systems are in place, are effective, and are reviewed regularly to safeguard and promote the welfare of children.

The Proprietor will maintain strategic oversight of safeguarding arrangements within the school and ensure that safeguarding is a standing item within governance processes. The Proprietor will monitor the effectiveness of safeguarding and child protection arrangements, challenge and support school leaders where appropriate, and ensure that deficiencies or weaknesses are remedied promptly.

The Designated Safeguarding Lead (DSL) will provide safeguarding reports to the Proprietor at least termly, and more frequently where required. These reports will enable the Proprietor to monitor safeguarding practice, training compliance, recruitment and vetting arrangements, safeguarding trends, attendance concerns, the effectiveness of early help and child protection interventions, online safety arrangements, and any emerging safeguarding risks. Discussions and decisions arising from these reports will be formally recorded and any actions identified will be monitored through to completion.

The Proprietor will ensure that safeguarding responsibilities are discharged effectively through robust monitoring, scrutiny and review of safeguarding systems. This will include oversight of:

- safeguarding and child protection policies and procedures;
- staff safeguarding training and induction;
- safer recruitment and single central record compliance;
- child protection record keeping;
- online safety, filtering and monitoring systems;
- allegations management procedures;
- attendance, children missing education and persistent absence;
- pupil wellbeing and welfare;
- multi-agency working and engagement with safeguarding partners;
- implementation of lessons learned from safeguarding incidents, audits, inspections and reviews.

The school will undertake a comprehensive annual safeguarding review and audit in accordance with Keeping Children Safe in Education (2026), local safeguarding partnership requirements and other relevant statutory guidance. The review will evaluate the effectiveness of safeguarding arrangements across the school and consider compliance with statutory duties, safeguarding culture, staff knowledge, training, record keeping, recruitment practices, online safety, pupil voice, early help arrangements and multi-agency working.

The findings of the annual safeguarding review will be formally reported to the Proprietor and used to inform the school's safeguarding development plan. Any identified actions will be clearly documented, assigned to named individuals, monitored against agreed timescales and reviewed regularly to ensure continuous improvement in safeguarding practice and compliance.

The Proprietor will ensure that safeguarding remains a key strategic priority and that sufficient resources, training, leadership capacity and support are available to enable the school to meet its safeguarding responsibilities effectively and promote a culture of vigilance, transparency and continuous improvement.

The Proprietor is:	Edward Smethurst
The Chair of the School Governance Board is:	Louise De Hayes
The Group Lead responsible for Safeguarding is:	Gemma Foster

b) The Headteacher

The Headteacher has overall responsibility for the day-to-day safeguarding and child protection arrangements within the school and will ensure that safeguarding is embedded within the school's culture, policies, procedures and practice. In carrying out this role, the Headteacher will:

- ensure that the safeguarding and child protection policies and procedures adopted by the Proprietor are fully implemented, understood and followed by all staff, volunteers, contractors and visitors, particularly those relating to the identification, reporting and referral of concerns regarding abuse, neglect, exploitation and other safeguarding risks;
- ensure that the school complies with statutory safeguarding duties set out in Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026), local safeguarding partnership procedures, the Prevent Duty and all other relevant legislation and guidance;
- promote a strong safeguarding culture in which the welfare of children is paramount, safeguarding is everyone's responsibility, and all decisions are made in the best interests of the child;
- act as the Case Manager and liaise with the Local Authority Designated Officer (LADO), safeguarding partners and other agencies where allegations or concerns are raised about a member of staff, volunteer, contractor, supply teacher or any other adult working with children;
- ensure that concerns, allegations and safeguarding complaints relating to adults working in the school are managed promptly, fairly and in accordance with statutory guidance, including allegations that may indicate a person poses a risk of harm to children;
- ensure that low-level concerns regarding adults working in or on behalf of the school are recorded, reviewed and managed in accordance with the school's Low-Level Concerns Policy and procedures, promoting a culture of openness and transparency;
- appoint an appropriately trained Designated Safeguarding Lead (DSL) and one or more Deputy DSLs and ensure that adequate safeguarding leadership and cover arrangements are available during term time and at any time when children are present on site or participating in school activities;
- ensure that the DSL and Deputy DSLs receive appropriate safeguarding and child protection training every two years and undertake regular updates, at least annually, to maintain their knowledge and skills in line with statutory guidance and local safeguarding arrangements;
- ensure that all staff, governors, volunteers and regular visitors receive appropriate safeguarding training, induction and ongoing updates, including training relating to online safety, child-on-child abuse, child sexual exploitation, child criminal exploitation, domestic abuse, mental health, serious violence, radicalisation and emerging safeguarding risks;
- ensure that sufficient time, funding, training, supervision and resources are provided to enable the DSL and other staff to carry out their safeguarding responsibilities effectively;
- ensure effective systems are in place for safeguarding record keeping, information sharing, monitoring concerns and supporting vulnerable children, including those with SEND, children in care, previously looked-after children and children in kinship care;

- ensure that the school works effectively with safeguarding partners and other agencies, contributing to Family Help, early help, child-in-need and child protection processes as required;
- ensure that appropriate online safety arrangements, including filtering and monitoring systems, are in place and are regularly reviewed to safeguard children from online harm and emerging technological risks, including AI-enabled abuse;
- ensure that safer recruitment procedures are implemented consistently and that all required pre-employment checks are completed in accordance with statutory requirements;
- make referrals to the Disclosure and Barring Service (DBS) and, where appropriate, the Teaching Regulation Agency (TRA) when a person has been dismissed, removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left employment because they posed a risk of harm to a child; this is a statutory duty;
- ensure that safeguarding concerns relating to children who are absent from education, missing education, attending alternative provision, educated otherwise than at school or subject to elective home education arrangements are appropriately identified and followed up;
- ensure that safeguarding policies and procedures are reviewed at least annually, and whenever there are significant changes to legislation, statutory guidance or local safeguarding arrangements;
- lead in a manner that promotes an open, positive and transparent culture where all staff feel confident and supported to raise safeguarding concerns, whistleblow where necessary, challenge poor practice and share information appropriately without fear of reprisal;
- ensure that any safeguarding weaknesses identified through audits, reviews, inspections, complaints or safeguarding incidents are addressed promptly and that appropriate actions are monitored through to completion.

c) Designated Safeguarding Lead (DSL) and Deputy DSL

The Designated Safeguarding Lead (DSL) and any Deputy DSLs are appropriately trained members of the senior leadership team with responsibility for safeguarding and child protection. The DSL and DDSs will undertake safeguarding and child protection training appropriate to their role at least every two years and will update their knowledge and skills at regular intervals, and at least annually, through additional training, briefing sessions, reading statutory guidance, participation in local safeguarding forums and engagement with safeguarding partner updates.

The role and responsibilities of the DSL are set out in Keeping Children Safe in Education (KCSIE) 2026, Part Two. The DSL will take lead responsibility for safeguarding and child protection, including online safety, and will support the school's whole-school approach to safeguarding.

In summary, the DSL and Deputy DSLs will:

- act as the school's principal point of contact for safeguarding and child protection matters and provide advice, guidance and support to staff, governors, volunteers and other professionals;
- refer cases of suspected abuse, neglect, exploitation and significant harm to Children's Social Care and support staff who make referrals;
- understand and apply local safeguarding thresholds, referral pathways and Family Help arrangements, ensuring children and families access support at the earliest opportunity;
- work with safeguarding partners and contribute effectively to Family Help, Child in Need, Child Protection and Looked After Children processes;

- refer cases to the Channel Programme where there are concerns that a child may be vulnerable to radicalisation and provide support to staff making such referrals;
- refer cases to the police where a criminal offence may have occurred or where a child may be at immediate risk of harm;
- liaise regularly with the Headteacher, Proprietor and safeguarding governor/director (where applicable) regarding safeguarding concerns, emerging risks, ongoing child protection plans, Section 47 enquiries and police investigations;
- understand the rights of children in police custody, including the requirement for an Appropriate Adult where applicable;
- promote a child-centred approach and ensure that the wishes, views and experiences of children are considered in safeguarding decision-making;
- liaise with teaching and support staff regarding safeguarding concerns and ensure information is shared appropriately to enable informed decisions about a child's welfare and safety;
- work closely with attendance, pastoral, SEND and mental health leads to identify risks and support children experiencing vulnerability, trauma, abuse, neglect or exploitation;
- where safeguarding concerns are linked to mental health, liaise with relevant health professionals, clinicians, Mental Health Support Teams and external agencies, recognising that mental health concerns may be indicators of abuse, neglect or exploitation;
- act as a source of expertise on child protection, contextual safeguarding, child-on-child abuse, online safety, exploitation, serious violence, domestic abuse, harmful sexual behaviour and emerging safeguarding concerns, including risks associated with artificial intelligence and online technologies;
- liaise with the Headteacher as Case Manager and the Local Authority Designated Officer (LADO) regarding concerns or allegations about adults working with children, including low-level concerns where appropriate;
- promote positive and constructive relationships with parents and carers while ensuring the child's welfare remains paramount;
- support staff to understand the safeguarding, welfare and child protection needs of children who have, or have previously had, a social worker, children in need, children subject to child protection plans, looked-after children, previously looked-after children and children in kinship care;
- promote educational outcomes for vulnerable children by:
 - ensuring relevant staff know which pupils have, or have previously had, a social worker, where appropriate and lawful;
 - understanding barriers to attendance, participation, attainment and progress;
 - maintaining high aspirations for vulnerable pupils;
 - supporting staff to make reasonable adjustments and provide appropriate educational support;
 - recognising the long-term impact that safeguarding concerns and adverse childhood experiences can have on educational outcomes.
- ensure appropriate representation, attendance and contribution at multi-agency safeguarding meetings and provide timely, accurate and evidence-based reports in accordance with local safeguarding partnership requirements;

- ensure safeguarding records are accurate, confidential, secure, factual and compliant with statutory requirements, local procedures, the Data Protection Act 2018 and UK GDPR;
- maintain records of concerns, discussions, decisions, actions taken and the rationale for decisions made;
- ensure safeguarding files are transferred securely and promptly when children move schools, obtaining confirmation of receipt and wherever possible sharing relevant information in advance of transfer to support continuity of safeguarding and educational provision;
- ensure that children who are absent from education, children missing education, those attending alternative provision and those subject to elective home education arrangements are appropriately monitored from a safeguarding perspective;
- take lead responsibility for online safety and work with relevant staff to ensure effective filtering and monitoring systems are in place, regularly reviewed and understood by staff and pupils;
- keep up to date with national and local safeguarding developments, emerging risks and changes to legislation, guidance and safeguarding partner arrangements.

Multi-Agency Meetings

The DSL, Deputy DSL or other appropriately nominated representative will attend and contribute to relevant multi-agency meetings convened by Children's Social Care, Police, Health Services, Youth Justice Services, Family Help teams and other safeguarding agencies, ensuring that the school fulfils its duty to cooperate with safeguarding partners.

These meetings may include:

- Family Help Meetings and Reviews
- Child in Need (CIN) Meetings
- Initial Child Protection Conferences (ICPC)
- Review Child Protection Conferences (RCPC)
- Core Group Meetings
- Strategy Discussions and Strategy Meetings
- Child Protection Planning Meetings
- Care Planning Meetings
- Looked After Child Reviews
- Multi-Agency Risk Assessment and Exploitation Meetings
- Complex Abuse Meetings
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) Panels
- Prevent and Channel Panels
- Any other safeguarding meeting relevant to the child's needs and circumstances.

Attendance, reports submitted, decisions made and actions arising from meetings will be recorded on the child's safeguarding record as soon as practicable and normally within two working days. Actions identified within meetings will be monitored and reviewed by the DSL to ensure they are implemented effectively and within agreed timescales.

1.6 Availability of the DSL

During school hours and term time, the Designated Safeguarding Lead (DSL) or a trained Deputy DSL will always be available to staff to discuss safeguarding concerns, make safeguarding decisions and coordinate referrals where necessary. Staff will be made aware of who is acting as the DSL and Deputy DSL at all times.

The DSL or Deputy DSL will normally be available on-site and in person. In exceptional circumstances where this is not possible, appropriate arrangements will be in place to ensure that safeguarding support remains immediately accessible through telephone, Microsoft Teams or other agreed communication methods, with clear escalation procedures available to staff.

The school will ensure that safeguarding arrangements remain effective whenever children are educated or supervised by the school, including before and after-school provision, educational visits, residential visits, alternative provision placements, extracurricular activities and any activities taking place outside normal school hours or during school holiday periods. Appropriate safeguarding leadership and emergency contact arrangements will be identified and communicated in advance.

Where the DSL is unavailable, a suitably trained Deputy DSL will assume responsibility for safeguarding matters. The Deputy DSL will be trained to the same standard as the DSL and will have the knowledge, skills, authority and capacity necessary to carry out the role effectively.

The Headteacher and DSL will ensure that adequate safeguarding cover arrangements are in place at all times, including contingency arrangements for staff absence, emergency situations and school-led activities taking place away from the school site.

All staff will continue to act immediately on any safeguarding concern and must never delay sharing information because the DSL is unavailable. Where there is a risk of immediate harm, staff will take appropriate action, including contacting Children's Social Care, the Police or emergency services directly, and informing the DSL as soon as possible thereafter.

The school will ensure that all staff know how to access safeguarding support, report concerns and seek advice both during and outside normal school hours, in accordance with local safeguarding partnership procedures and statutory guidance.

1.7 Transfer of Child Protection and Safeguarding Files

When a child leaves the school, the Designated Safeguarding Lead (DSL) will ensure that the child's safeguarding and child protection file is transferred securely to the DSL (or equivalent safeguarding lead) within the receiving school, college, alternative provision or other education setting as soon as possible. Child protection files should be transferred separately from the main pupil file and without delay to ensure continuity of safeguarding support.

In line with statutory guidance, where a child transfers to another educational setting, the safeguarding file should be transferred within 5 working days for an in-year transfer or, where the child leaves at the end of a term, within the first 5 working days of the new term. The sending school will retain evidence of the transfer and receipt of the file.

Prior to transferring safeguarding records, the DSL will take reasonable steps to verify that the child has been admitted to, or is expected to attend, the receiving setting and that the records are being transferred to the appropriate safeguarding professional.

The DSL will ensure that:

- a safeguarding file transfer record or summary is completed;
- safeguarding and child protection records are transferred separately from the main pupil file;
- records are transferred securely, confidentially and in accordance with the Data Protection Act 2018 and UK GDPR;
- confirmation of receipt is obtained from the receiving school, college or setting, including the name, role and date of receipt of the person accepting responsibility for the records;
- where records are transferred electronically, secure methods of transfer are used and receipt is confirmed in writing;
- where hard-copy records are transferred, they are delivered securely by hand wherever possible;
- if hand delivery is not possible, records are sent using a secure tracked and signed-for delivery service in a sealed package clearly marked "Strictly Confidential - For the Attention of the Designated Safeguarding Lead Only";
- a record of the date sent, method of transfer and receipt confirmation is retained within the school's safeguarding records.

The DSL will consider whether safeguarding information should be shared with the receiving school, college or setting in advance of the child's start date, where this is necessary to protect the child, support their welfare or enable appropriate safeguarding arrangements to be put in place from the outset. This may include information relating to children who have, or have previously had, a social worker; children subject to Child in Need or Child Protection plans; children in care; children in kinship care; children at risk of exploitation; children with significant attendance concerns; or children who are receiving ongoing safeguarding support.

The DSL will ensure that any information shared is relevant, proportionate, necessary and in the best interests of the child, and that information sharing is carried out in accordance with statutory safeguarding guidance, local safeguarding partnership procedures and data protection legislation.

Where a child leaves the school and the destination is unknown, the school will follow local procedures for children missing education and will work with the Local Authority and other relevant agencies to establish the child's whereabouts and ensure that safeguarding concerns are appropriately addressed.

1.8 Children Who May Be Vulnerable to Abuse, Neglect or Exploitation

The school recognises that safeguarding concerns can affect any child; however, some children may have an increased vulnerability to abuse, neglect, exploitation or other safeguarding risks due to their individual circumstances, experiences, needs or protected characteristics. We recognise that all pupils attending The Willows School may be more vulnerable to harm because of their special educational needs, disabilities, communication needs, learning difficulties, health needs or other additional vulnerabilities and may face additional barriers to recognising, reporting or disclosing abuse.

The school acknowledges that children with special educational needs and disabilities (SEND) can be disproportionately impacted by safeguarding concerns, including bullying, exploitation, online abuse, child-on-child abuse and neglect. Staff will be particularly alert to indicators of abuse and recognise that behavioural, communication or emotional difficulties may mask underlying safeguarding concerns.

We recognise that children who have a social worker, have previously had a social worker, are subject to Child in Need plans, Child Protection plans, are looked after, previously looked after, or living in kinship care may experience increased vulnerability and face additional barriers to attendance, learning, achievement, emotional wellbeing and healthy relationships. Experiences of abuse, neglect, trauma, exploitation and adversity can have a lasting impact on children's development, mental health and educational outcomes.

The Designated Safeguarding Lead (DSL) will take reasonable steps to establish whether newly admitted pupils are known to Children's Social Care, Family Help services or other safeguarding agencies. This will include liaising with the child's previous school, the receiving or placing authority where applicable, and any relevant professionals to ensure continuity of safeguarding support and effective transition planning.

Where a child has an existing safeguarding record, Child in Need Plan, Child Protection Plan, Early Help or Family Help involvement, looked-after status, previous social worker involvement, or any identified safeguarding vulnerability, the DSL will ensure that appropriate information is obtained, reviewed and acted upon in accordance with statutory guidance and local safeguarding procedures.

The DSL will liaise with the previous educational setting to obtain safeguarding information promptly and ensure that any safeguarding or child protection file is transferred securely in accordance with the timescales and expectations set out in Keeping Children Safe in Education (2026).

Where safeguarding concerns require intervention, the DSL or Deputy DSL will make referrals and engage with Children's Social Care, Family Help, safeguarding partners and other agencies in accordance with this policy and local safeguarding procedures. The needs and circumstances of any child who has or has had a social worker will be a key consideration when determining the school's response to a safeguarding concern.

The school will work closely with families and partner agencies to ensure that children receive appropriate help and support at the earliest opportunity. This may include pastoral support, attendance support, behavioural support, safeguarding interventions, mental health support, reasonable adjustments and additional educational provision where required.

The school recognises that safeguarding concerns often overlap and that children may experience multiple harms simultaneously. Staff will remain vigilant to risks including:

- abuse and neglect;
- child criminal exploitation (CCE);
- child sexual exploitation (CSE);
- serious violence and county lines;
- domestic abuse;
- child-on-child abuse;
- harmful sexual behaviour;
- online abuse and exploitation;
- radicalisation and extremism;
- mental health concerns;
- children missing education;
- attendance concerns and persistent absence;
- homelessness;
- discriminatory abuse;
- violence against women and girls (VAWG);
- contextual safeguarding risks arising within peer groups, communities or online environments.

The school will maintain robust procedures for monitoring attendance and responding to unauthorised absence, persistent absence and children missing education. Safeguarding considerations will form part of all attendance-related decision making. Where concerns arise, the school will work proactively with families, local authorities and partner agencies to reduce risks and promote children's welfare, safety and educational engagement.

Alongside any statutory intervention, the school will continue to provide pastoral, emotional and educational support to vulnerable children and will work collaboratively with clinicians, health professionals, social workers and other agencies to promote positive outcomes and reduce the risk of future harm.

All staff should be aware that vulnerability is dynamic and that children may become vulnerable at any time. Staff should maintain professional curiosity, remain alert to changes in presentation, behaviour, attendance and wellbeing, and act promptly on any concerns in accordance with this policy.

2.0 IF YOU ARE WORRIED ABOUT A CHILD

2.1 Actions to Take if You are Worried about a Child

Safeguarding and promoting the welfare of children is everyone's responsibility. No single practitioner can be expected to have a full picture of a child's circumstances and needs. If children and families are to receive the right help, support and protection at the right time, all professionals who come into contact with them have a role to play in identifying concerns, sharing information appropriately and taking prompt action.

All staff will adopt a child-centred approach to safeguarding and will always act in the best interests of the child. Staff should maintain an attitude of "*it could happen here*" and recognise that safeguarding concerns can occur both inside and outside the home, including online.

The school will follow:

- Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures and local safeguarding arrangements;
- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- local authority threshold guidance and Family Help arrangements; and
- all other relevant statutory safeguarding guidance and legislation.

All staff should be aware that abuse, neglect, exploitation and safeguarding concerns can take many forms and may include concerns relating to:

- physical, emotional or sexual abuse;
- neglect;
- child criminal exploitation (CCE);
- child sexual exploitation (CSE);
- child-on-child abuse;
- harmful sexual behaviour;
- serious violence;
- domestic abuse;
- online abuse and online exploitation;
- radicalisation and extremism;
- bullying, including cyberbullying and prejudice-based bullying;
- mental health concerns where these may be linked to abuse, neglect or exploitation;
- violence against women and girls (VAWG);
- discriminatory abuse; and
- any other circumstance that may place a child at risk of harm.

Staff should be aware that children may not feel ready, able or know how to tell someone that they are being abused, neglected, exploited or otherwise harmed. Children may not recognise that what is happening to them is harmful and may be reluctant to disclose concerns because of fear, embarrassment, shame, trauma, disability, communication difficulties, cultural factors, language barriers, previous experiences, gender identity, sexual orientation or loyalty to others.

These barriers should never prevent staff from taking action. All staff should maintain professional curiosity, be alert to changes in a child's presentation, behaviour, attendance, wellbeing or emotional state, and discuss any concerns with the Designated Safeguarding Lead (DSL) or Deputy DSL without delay.

Staff must not assume that somebody else has taken action and should always follow up if they are uncertain that appropriate action has been taken. If, at any point, there is a risk of immediate serious harm to a child, a referral should be made immediately to Children's Social Care and/or the Police. Anyone can make a referral; however, staff should inform the DSL as soon as possible if they do so.

All concerns, discussions, decisions and actions taken must be recorded promptly, accurately and factually in accordance with the school's safeguarding procedures. The rationale for decisions and any actions taken should also be clearly documented.

The school recognises the importance of building trusted, respectful and supportive relationships with children and young people. Staff will seek to create safe environments where children feel listened to, valued and able to share worries and concerns. Effective communication, listening carefully to the child's voice and responding appropriately to their needs are essential elements of safeguarding practice.

Where appropriate, the school will work collaboratively with children, families and relevant agencies to provide timely support through Family Help, Early Help, Child in Need, Child Protection and other safeguarding processes, ensuring that children receive the right support at the right time.

2.2 Child Protection Procedures

The school is committed to ensuring that effective child protection procedures are in place and implemented consistently in accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, local safeguarding partnership procedures and all relevant legislation.

The school will ensure that:

- this Safeguarding and Child Protection Policy is published on the school's website and is available on request from the school office;
- parents, carers and pupils are made aware of the school's safeguarding responsibilities, including the fact that concerns about a child's welfare, abuse, neglect or exploitation may be shared with Children's Social Care, the Police or other relevant agencies where there is a safeguarding concern or where this is otherwise required to protect a child;
- parents and carers understand the role of the school in identifying concerns, providing support, sharing information and making referrals to Children's Social Care, Family Help and other safeguarding services when appropriate;
- all staff, governors, volunteers, contractors and regular visitors are provided with safeguarding and child protection information, receive appropriate safeguarding training and understand their safeguarding responsibilities, including how to identify, respond to and report concerns;
- all staff are aware of, understand and follow this policy, the staff Code of Conduct, procedures for managing allegations and low-level concerns, whistleblowing procedures and safeguarding reporting arrangements;
- safeguarding concerns are acted upon promptly, recorded accurately and referred to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay;
- appropriate action is taken where concerns indicate that a child may require Family Help, Early Help, Child in Need services, Child Protection intervention or support from other agencies;
- children are supported through a child-centred approach that recognises their wishes, feelings, lived experiences and individual needs;

- safeguarding concerns relating to online safety, child-on-child abuse, exploitation, serious violence, domestic abuse, mental health, attendance and children missing education are identified and managed appropriately;
- safeguarding records are maintained securely, confidentially and in accordance with statutory guidance, the Data Protection Act 2018 and UK GDPR requirements;
- the school works effectively with safeguarding partners and other agencies to safeguard and promote the welfare of children;
- safeguarding and child protection arrangements are monitored by senior leaders and the Proprietor and are subject to regular review, scrutiny and quality assurance;
- this policy is reviewed at least annually by the Proprietor, or earlier where there are changes to legislation, statutory guidance, local safeguarding arrangements or identified safeguarding concerns requiring policy revision; and
- all safeguarding procedures remain effective, responsive to emerging risks and reflective of current statutory requirements and best practice.

2.3 What Staff, Volunteers or Visitors Should Do If They Have Concerns About a Child

All staff, volunteers, contractors and visitors have a responsibility to take action if they are concerned about a child's welfare, safety or wellbeing. Safeguarding is everyone's responsibility and all concerns should be taken seriously, regardless of how insignificant they may appear. Staff should maintain an attitude of "it could happen here" and act in the best interests of the child at all times.

If a member of staff, volunteer or visitor has any concern about a child, they must report it immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL. Staff should not delay sharing information in order to gather further evidence or investigate concerns themselves.

Where staff are unsure whether a concern meets the threshold for safeguarding or child protection intervention, they should still discuss the matter with the DSL or Deputy DSL. The DSL will consider the concern, assess the level of need and determine the appropriate course of action, including whether support through Family Help, Early Help, Children's Social Care, the Police or another agency may be required.

Staff must never:

- do nothing when they have a concern about a child;
- assume that another person has reported, acted upon or will deal with the concern;
- investigate concerns themselves;
- ask leading questions or attempt to interview the child;
- promise confidentiality to a child;
- delay reporting concerns whilst seeking further information.

The process at The Willows School

Where a member of staff, volunteer or visitor has a safeguarding concern:

- concerns must be reported verbally to the DSL or Deputy DSL as soon as possible and on the same working day;
- where there is a risk of immediate harm, Children's Social Care, the Police or emergency services must be contacted without delay, and the DSL informed as soon as possible thereafter;
- all concerns, disclosures, observations and actions taken must be recorded accurately, factually and promptly on the school's safeguarding recording system (CPOMS) before the end of the same working day;
- records should clearly distinguish between fact, observation, professional opinion and information provided by others;

- records should include the child's words wherever possible and avoid assumptions or personal interpretations;
- staff should record the date, time, location, persons present and actions taken;
- staff must ensure that the rationale for any decisions or actions is documented.

Supply Staff, Agency Staff, Contractors and Visitors

Supply staff, agency workers, contractors and other adults working temporarily within the school must report safeguarding concerns immediately to the DSL or Deputy DSL.

Where they do not have direct access to CPOMS, they should complete Appendix 1: Safeguarding Concern Recording Form and submit it to the DSL or Deputy DSL before leaving the school site and, in all cases, before the end of the working day. The DSL will ensure that the concern is subsequently entered onto the school's safeguarding recording system.

Recording Injuries

Where injuries, marks or visible signs of harm are observed:

- the concern must be reported immediately to the DSL or Deputy DSL;
- a written factual record must be completed;
- injuries should be recorded using the CPOMS Body Map function or the school's approved body map template;
- records should accurately describe the location, size, colour and appearance of any injury;
- staff should not photograph injuries unless there is a specific agreed procedure authorising this;
- staff should not ask the child to remove clothing beyond what is necessary to view an injury that is already visible;
- all records must be completed as soon as possible and shared with the DSL. See Section 2.16 and Appendix 2: Body Map Guidance and Templates.

Professional Curiosity

All staff should exercise professional curiosity and remain alert to indicators of abuse, neglect, exploitation, child-on-child abuse, harmful sexual behaviour, domestic abuse, online harm, child criminal exploitation, child sexual exploitation, radicalisation, serious violence, attendance concerns and other safeguarding risks. Staff should be particularly vigilant when working with pupils who have SEND, communication difficulties, social workers, or other identified vulnerabilities.

If the DSL Is Not Available

If the DSL and Deputy DSL are unavailable, staff must not delay action. They should follow the school's escalation procedures and, where necessary, contact Children's Social Care, the Police or emergency services directly. The DSL should be informed of any action taken as soon as possible.

2.4 Priorities the DSL Should Consider

When a safeguarding concern is raised, the Designated Safeguarding Lead (DSL) must take a child-centred approach, consider the child's welfare and best interests at all times, and make decisions in accordance with local safeguarding partnership procedures, Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children 2026. Safeguarding decisions should be informed by professional curiosity, information sharing, multi-agency working and an understanding that children may experience multiple vulnerabilities and harms simultaneously.

The DSL should consider the following questions when assessing a concern:

- Am I dealing with risk, need, or both? A child who is at risk of harm is also likely to be a child in need of help and support. The DSL should assess the nature, severity, immediacy and likelihood of harm alongside the child's wider welfare and support needs.
- Does the child require immediate protection? The DSL should consider whether the child is suffering, or is likely to suffer, significant harm and whether urgent action or referral to Children's Social Care, the Police or another statutory agency is required.
- Can the child's needs be met through:
 - universal or targeted support within school;
 - pastoral, attendance, wellbeing or SEND support;
 - Family Help or Early Help intervention;
 - referral to Children's Social Care as a Child in Need;
 - referral to Children's Social Care due to suspected significant harm;
 - referral to health, therapy, neurodevelopmental or specialist clinical services;
 - referral to CAMHS, Mental Health Support Teams or other emotional wellbeing services;
 - support from specialist services addressing exploitation, substance misuse, domestic abuse, youth violence or other safeguarding concerns.

Additional Considerations

The DSL should also consider:

- the child's wishes, views, feelings and lived experiences, taking account of age, understanding, communication needs and any disabilities;
- whether the child has additional vulnerabilities, including SEND, mental health needs, social care involvement, being looked after, previously looked after, living in kinship care, being a young carer or experiencing persistent absence from education;
- whether the concern involves abuse, neglect, child criminal exploitation, child sexual exploitation, child-on-child abuse, harmful sexual behaviour, serious violence, domestic abuse, radicalisation, online harm or other forms of exploitation;
- the context in which the concern or behaviour occurred, including family circumstances, peer relationships, community influences and online activity, recognising the importance of contextual safeguarding;
- the information available from school records, attendance data, safeguarding records, staff observations and discussions with the child and family;
- whether there are gaps in information and whether further information sharing with relevant professionals or agencies is necessary;
- local threshold guidance and referral pathways, including whether a Family Help, Child in Need or Child Protection response is required;
- whether parental consent should be sought for support or information sharing, unless doing so may place the child at greater risk of harm, compromise safeguarding action or prejudice a criminal investigation;
- which professionals need to be consulted, informed or involved and what information they require in order to safeguard and support the child effectively;
- what support, advice, supervision or consultation may be required from Children's Social Care, safeguarding partners, health professionals, the Local Authority Designated Officer (LADO), Prevent partners or specialist services;
- whether attendance concerns, persistent absence, emotional wellbeing concerns, online safety issues or emerging risks such as AI-enabled abuse form part of the safeguarding picture;
- the protective factors, strengths, resilience, family support and professional networks that may reduce risk and improve outcomes for the child.

Where a Referral Is Not Made

If the DSL decides that a referral to Children's Social Care or another statutory agency is not required, they must clearly record:

- the information considered;
- the rationale for the decision;
- the level of assessed need and risk;
- any advice sought;
- any support to be provided by the school;
- any referral to Family Help, Early Help or other services;
- discussions with parents, carers or professionals where appropriate;
- monitoring arrangements, timescales and review dates;
- contingency plans should circumstances change or risks escalate.

All decisions, discussions, actions and outcomes must be recorded promptly, accurately and securely on the school's safeguarding recording system in accordance with statutory guidance, local procedures, the Data Protection Act 2018 and UK GDPR requirements.

2.5 DSL Feedback to Staff Reporting Concerns

The school recognises the importance of providing appropriate feedback to staff who raise safeguarding concerns. Effective feedback supports a strong safeguarding culture, encourages professional vigilance and reassures staff that concerns have been considered and acted upon appropriately. At the same time, the school has a duty to maintain confidentiality and protect sensitive information relating to children, families and ongoing safeguarding processes.

The Designated Safeguarding Lead (DSL) will:

- acknowledge and consider all safeguarding concerns reported by staff, volunteers, contractors and visitors without delay;
- ensure that staff who raise concerns receive appropriate confirmation that their concern has been received and considered;
- provide feedback, where appropriate and lawful, regarding the action taken or planned in response to a safeguarding concern;
- determine what information can be shared, with whom and when, based on the child's welfare, confidentiality requirements, data protection obligations and any ongoing safeguarding, police or social care investigations;
- share information on a strictly 'need-to-know' basis, ensuring that only those who require information to safeguard and support the child have access to it;
- maintain accurate records of safeguarding concerns, decisions, actions and outcomes, including the rationale for information-sharing decisions;
- encourage staff to seek further clarification from the DSL where they remain concerned that appropriate action has not been taken.

Staff should understand that it may not always be possible for the DSL to provide detailed feedback following a referral or safeguarding intervention. This may be due to:

- confidentiality requirements;
- data protection legislation;
- directions from Children's Social Care, the Police or other agencies;
- the need to protect the child, family members or other individuals;
- the existence of ongoing enquiries, assessments or investigations.

Where detailed feedback cannot be provided, the DSL will, wherever possible, reassure the reporting member of staff that the concern has been appropriately considered and that action has been taken in accordance with safeguarding procedures.

Staff must not assume that no action has been taken simply because they have not received detailed feedback. If a member of staff remains concerned about a child or believes that appropriate action has not been taken, they should continue to raise the matter with the DSL, Headteacher or through the school's escalation procedures. Staff retain the right to make a referral directly to Children's Social Care if they believe a child is at risk of harm.

The school is committed to promoting an open, transparent and supportive safeguarding culture where staff feel confident raising concerns, exercising professional curiosity and challenging decisions where necessary to ensure the best possible outcomes for children.

2.6 Consent and Information Sharing

The school recognises that effective information sharing is essential to safeguarding and promoting the welfare of children. We are committed to ensuring that personal information is handled lawfully, fairly, proportionately and securely, while recognising that data protection legislation should never be a barrier to sharing information where failure to do so would place a child at risk of harm.

Sensitive and personal information will be managed in accordance with:

- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- the Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers;
- Department for Education Data Protection Guidance for Schools; and
- local safeguarding partnership information-sharing protocols and procedures.

All staff, including the Proprietor, governors, trustees, volunteers and contractors, are expected to understand their responsibilities regarding confidentiality, record keeping and information sharing and should familiarise themselves with the school's Data Protection Policy and relevant statutory guidance.

The school recognises that children are best protected when professionals work together effectively. Staff should never allow concerns about information sharing to prevent them from taking action to safeguard a child. The UK GDPR and Data Protection Act 2018 do not prevent the sharing of information for safeguarding purposes where it is necessary, proportionate and lawful to do so.

All staff are responsible for sharing safeguarding concerns promptly with the Designated Safeguarding Lead (DSL) or Deputy DSL and must not assume that another person will pass information on or take action. Safeguarding information should be shared internally on a need-to-know basis and externally where this is necessary to protect a child or promote their welfare.

The school will work openly and honestly with parents and carers wherever possible and appropriate. We will usually seek to discuss safeguarding concerns and information sharing decisions with parents or carers and obtain consent where this is safe and appropriate to do so. However, consent is not required where seeking consent may:

- place a child at increased risk of harm;
- place another person at risk of harm;

- prejudice the prevention, detection or investigation of a crime;
- compromise a safeguarding enquiry or child protection investigation;
- lead to the destruction of evidence; or
- otherwise be contrary to the child's best interests.

The welfare and best interests of the child will always be the school's paramount consideration. Where there is a safeguarding concern, relevant information may be shared with Children's Social Care, Family Help services, the Police, Health Services, safeguarding partners and other agencies without consent where there is a lawful basis to do so and where sharing the information is necessary to safeguard or promote the welfare of a child.

Information shared should be:

- necessary for the purpose for which it is being shared;
- proportionate to the identified need or risk;
- relevant and accurate;
- timely;
- secure; and
- shared only with those who need the information to fulfil their safeguarding responsibilities.

The DSL will ensure that clear records are maintained of:

- safeguarding concerns;
- decisions regarding consent;
- information-sharing decisions;
- advice sought from other agencies;
- referrals made;
- actions taken; and
- the rationale for significant safeguarding decisions.

The school recognises that some children may be at heightened risk if personal information is disclosed inappropriately. Particular care will be taken where children are:

- living in refuge or emergency accommodation;
- at risk of domestic abuse;
- at risk of honour-based abuse;
- looked after by the local authority;
- subject to Child Protection Plans;
- victims of stalking, harassment or exploitation; or
- otherwise assessed as being at risk of serious harm.

Where disclosure of information would place a child or another individual at risk of serious harm, the school will act in accordance with safeguarding legislation, data protection legislation and any relevant advice from Children's Social Care, the Police or other statutory agencies.

The school recognises that effective safeguarding depends upon timely, appropriate and lawful information sharing. All staff should be confident that they can share information where necessary to protect a child and should seek advice from the DSL whenever they are uncertain. Fears about sharing information must never stand in the way of protecting a child from abuse, neglect, exploitation or other forms of harm.

Further guidance:

- Data Protection in Schools (DfE): <https://www.gov.uk/guidance/data-protection-in-schools>
- Information Sharing Advice for Practitioners (DfE)
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026.

2.7 Involving the Police

The school recognises that there will be occasions when Police involvement is necessary to safeguard and promote the welfare of a child, prevent harm, investigate a crime, or manage situations where there is an immediate risk to the safety of pupils, staff or others. The school will work constructively with the Police, Children's Social Care and other safeguarding partners in accordance with Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026) and local safeguarding partnership procedures.

Police involvement may be required where:

- a child is suffering, or is likely to suffer, significant harm;
- a criminal offence is suspected or has been committed;
- there are concerns regarding child sexual abuse, child sexual exploitation, child criminal exploitation, serious violence, domestic abuse or radicalisation;
- a child is found in possession of drugs, weapons or prohibited items;
- there is an immediate threat to life or safety;
- an incident involves sexual violence, serious assault, criminal damage or other serious criminal behaviour; or
- Police assistance is necessary to safeguard a child or manage risk.

Before Contacting the Police

Except in situations involving immediate danger or where urgent emergency action is required, staff must report concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay. The DSL and/or Headteacher will consider the circumstances, take advice where necessary and determine whether Police involvement is required.

The Headteacher and DSL will ensure that decisions regarding Police involvement are informed by:

- statutory safeguarding guidance;
- local safeguarding partnership procedures;
- local authority protocols;
- the National Police Chiefs' Council (NPCC) guidance "When to Call the Police";
- behaviour, safeguarding and risk assessment processes; and
- the best interests and welfare of the child.

Where a situation presents an immediate risk of serious harm, staff should not delay contacting the Police or emergency services. The DSL should be informed as soon as practicable after emergency action has been taken.

Working with the Police

When Police attend the school, the Headteacher, DSL or another appropriately delegated senior leader will liaise with officers to ensure there is a clear understanding of:

- the purpose of Police involvement;
- the legal basis for any action being taken;
- whether a child is a victim, witness or suspect;
- the proposed course of action;
- safeguarding considerations;
- information-sharing requirements; and
- any support required for the child.

The school will work cooperatively with the Police while ensuring that children's welfare, rights, dignity and educational needs remain key considerations throughout any process.

Appropriate Adults

Where a pupil is being questioned by the Police under caution, detained, arrested or searched as a suspect, the school will seek assurance that an Appropriate Adult is present where required by law and in accordance with the Police and Criminal Evidence Act (PACE) Codes of Practice.

The role of the Appropriate Adult is to:

- safeguard and promote the child's rights, welfare and wellbeing;
- support communication and understanding;
- ensure that procedures are followed fairly and appropriately;
- help the child understand what is happening and their rights; and
- observe whether the child is being treated properly and fairly.

Where appropriate and safe to do so, a parent or carer will normally be invited to undertake the role of Appropriate Adult. Where this is not possible, alternative arrangements will be made in accordance with Police procedures and statutory guidance. School staff will only undertake the role where appropriate, after considering potential conflicts of interest and the individual circumstances of the case.

Child Welfare During Police Involvement

The DSL will consider any safeguarding implications arising from Police involvement and whether additional support, assessment or referral is required. This may include:

- referral to Children's Social Care;
- Family Help or Early Help support;
- mental health support services;
- risk assessments;
- review of safeguarding plans; or
- multi-agency safeguarding intervention.

Where a child is interviewed, searched, arrested or otherwise involved in a Police investigation, the DSL will ensure that relevant safeguarding records are updated and that the child's welfare is monitored appropriately following the incident.

Recording and Information Sharing

All discussions, decisions, actions taken and information shared with the Police must be recorded promptly, accurately and securely on the school's safeguarding recording system. Records should include:

- the nature of the concern or incident;
- advice sought;
- agencies involved;
- actions taken;
- outcomes; and
- the rationale for decisions made.

Information sharing with the Police will be conducted in accordance with safeguarding legislation, the Data Protection Act 2018, UK GDPR, local information-sharing arrangements and the principle that data protection legislation must not prevent appropriate information sharing where this is necessary to keep children safe.

Useful References

- NPCC Guidance: *When to Call the Police*
- Police and Criminal Evidence Act (PACE) Codes of Practice
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Local Children's Safeguarding Assurance Partnership Procedures.

2.8 Consent, Parents/Carers, Early Help, Family Help and Child Protection Referrals

The school is committed to working in partnership with parents and carers wherever possible and recognises that effective engagement with families is an important part of safeguarding and promoting the welfare of children. However, the welfare of the child will always be the school's paramount consideration.

The Designated Safeguarding Lead (DSL) will, wherever appropriate, be open and honest with parents/carers about concerns regarding their child and will seek to involve them in safeguarding processes and decision-making. The DSL will consider on a case-by-case basis whether informing parents/carers is in the child's best interests and whether doing so may place a child or another person at increased risk of harm or compromise safeguarding action.

Family Help and Early Intervention

The school recognises the importance of providing help and support as soon as problems emerge. Early identification and intervention can prevent concerns from escalating and improve outcomes for children and families. The school will work in accordance with local Family Help arrangements and referral pathways, recognising that Family Help brings together targeted Early Help and wider support services to provide coordinated assistance for children and families.

Where concerns indicate that a child or family may benefit from additional support but does not meet the threshold for statutory social care intervention, the DSL will consider:

- school-based support and pastoral intervention;
- attendance and wellbeing support;
- SEND support;
- Family Help/Early Help services;
- health and mental health support; and
- referral to other relevant agencies and services.

The DSL will normally discuss Family Help or Early Help referrals with parents/carers and seek their agreement to engage with support services. However, the school recognises that there may be occasions where consultation with Children's Social Care or another safeguarding agency is required before speaking with parents/carers.

Children Who May Benefit from Family Help or Early Intervention

All staff should be alert to the potential need for Family Help, Early Help or additional support for a child who:

- has a disability or additional needs;
- has special educational needs and/or disabilities (SEND), whether or not they have an Education, Health and Care Plan (EHCP);
- is a young carer;
- has mental health, emotional wellbeing or behavioural difficulties;
- has a social worker or has previously had a social worker;
- is looked after, previously looked after or living in kinship care arrangements;
- is frequently absent from school, persistently absent, missing education, home or care;

- is at risk of suspension, exclusion or attends alternative provision;
- is showing signs of being drawn into anti-social behaviour, criminal behaviour, serious violence, gangs or organised crime;
- is at risk of child criminal exploitation (CCE) or child sexual exploitation (CSE);
- is at risk of radicalisation or extremism;
- is vulnerable to online abuse, harmful online content, misinformation, disinformation or technology-facilitated abuse;
- is experiencing domestic abuse, substance misuse, parental mental ill health, housing difficulties or other challenging family circumstances;
- is misusing drugs or alcohol; or
- is experiencing multiple vulnerabilities or forms of harm simultaneously.

Staff should discuss any concerns with the DSL or Deputy DSL, who will determine the most appropriate response and level of intervention.

Child Protection Referrals

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL or Deputy DSL will make a referral to Children's Social Care in accordance with local safeguarding partnership procedures and statutory guidance.

The school will usually seek to discuss concerns with parents/carers and be transparent about the need to make a Child Protection referral under Section 47 of the Children Act 1989. However, there are circumstances where informing parents/carers before making a referral would not be appropriate.

A referral may be made without prior discussion with parents/carers where doing so may:

- place the child at increased risk of significant harm;
- place another person at risk of harm;
- cause unreasonable delay in protecting the child;
- prejudice a police investigation or criminal proceedings;
- compromise a Children's Social Care assessment or enquiry;
- lead to intimidation of a child, witness or professional;
- lead to the destruction or concealment of evidence; or
- otherwise be contrary to the child's best interests.

Examples of situations where parents/carers may not be informed before a referral is made include, but are not limited to:

- fabricated or induced illness (FII);
- perplexing presentations (PP);
- female genital mutilation (FGM);
- forced marriage;
- so-called honour-based abuse;
- child sexual abuse;
- intra-familial sexual abuse;
- child sexual exploitation;
- child criminal exploitation;
- trafficking or modern slavery;
- radicalisation concerns;
- domestic abuse where notification may increase risk;
- concerns involving abusive images of children or online child sexual abuse; and
- any situation where consultation with parents/carers may place a child or another individual at risk.

Where the decision is made not to inform parents/carers prior to referral, the DSL will clearly record:

- the decision made;
- the rationale for the decision;
- any advice obtained from Children's Social Care, the Police or other professionals;
- actions taken; and
- the outcome of the referral.

All decisions, discussions and referrals will be accurately recorded on the school's safeguarding recording system, including the professional rationale underpinning decision-making.

The welfare and safety of the child will always be the school's paramount consideration and will underpin all safeguarding decisions, information-sharing arrangements and referral processes.

2.9 Consideration for Referrals to Children's Social Care and Thresholds Guidance

Thresholds for Intervention and Referrals

The Designated Safeguarding Lead (DSL) will consider all safeguarding concerns and information received in line with **Lancashire (LCC)** and local safeguarding partnership procedures.

The CoNR Framework supports professionals to identify children's needs at the earliest opportunity and determine the most appropriate level of support. It provides a shared understanding of need, risk and vulnerability, ensuring that children and families receive the right help at the right time. [inspiretolearn.co.uk]

Where concerns indicate that a child may be suffering, or is likely to suffer, significant harm, the DSL will make a referral to Children's Social Care. Referrals will clearly outline the nature of the concerns and demonstrate how the child's circumstances meet the threshold for statutory intervention.

Staff should be familiar with the Children's Continuum of Need and Response Framework and seek advice from the DSL if they are concerned about a child's welfare or are unsure of the most appropriate course of action.

Further information about the Lancashire Children's Continuum of Need and Response Framework and local safeguarding procedures can be found via the Lancashire Safeguarding Children Partnership website



al.pdf

2.10 Referrals to Children's Social Care

Anyone can make a referral to Children's Social Care (CSC) although usually this will be the DSL or Deputy DSL who will make judgements around 'significant harm', levels of 'need' and when to make a referral in line with the procedures and threshold guidance from **Lancashire (LCC)** and the **Children's Continuum of Need and Response Framework (CoNR)**

Where a DSL or Deputy DSL considers the concern in line with thresholds, a referral to Children's Social Care (CSC) is required. Two thresholds and their related criteria need to be carefully considered:

- (1) Child in Need/ Referral under Section 17 (S17) – see 2.11
- (2) Child Protection Matter/ Referral under Section 47 (S47) – see 2.12.

2.11 Child in Need/ Referral under Section 17 (s17)

(1) Is this a Child In Need?

Under section 17 (s.17 (10)) of the Children Act 1989, a child is in need if:

- (a) they are unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority
- (b) their health or development is likely to be impaired, or further impaired, without the provision of such services
- (c) they have a disability.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under Section 17 (S17).

Where a s17 referral is made, the written referral to CSC will be completed and sent securely on the agreed Lancashire (LCC) pro forma. The Lancashire Multi-Agency Safeguarding Hub (MASH) team <https://activelancashire.org.uk/safe-in-sport/>

2.12 Child Protection Referral under Section 47 (s47):

(2) Is this a Child Protection Matter?

Under Section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:

- (a) is the subject of an Emergency Protection Order
- (b) is in Police Protection; or where the local authority has
- (c) reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

Therefore, the '**significant harm threshold**' justifies statutory intervention into family life. A professional making a child protection referral under Section 47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm.

Referrals under Section 47 do not require consent, however we recognise best practice that concerns should be discussed openly and honestly with parents/ carers and that they should be informed of a referral, unless it would:

- cause further significant harm to the child
- cause undue delay
- would impede an investigation

Where a child is at immediate risk or has suffered significant harm then a referral CSC and/ or police [as appropriate] will be required immediately.

Call to make a referral to CSC: 0300 123 6720

Call for the out of hours/ Emergency Duty Team (EDT): 0300 123 6722

Where a s47 referral is made, the written referral to CSC will be completed and sent securely on the agreed Lancashire (LCC) pro forma.

2.13 Early Help and Family Help

The school recognises that providing help and support at the earliest opportunity is more effective than responding after concerns have escalated. Early intervention can improve outcomes for children, reduce risk, strengthen family resilience and prevent the need for statutory intervention. In accordance with Working Together to Safeguard Children 2026, the school recognises the transition towards Family Help arrangements, which bring together targeted Early Help and wider family support services to provide coordinated, child-centred intervention.

Early Help and Family Help mean providing support as soon as a problem emerges, at any stage in a child's life, from infancy through to adolescence. The school will work with children, families and partner agencies to identify needs early and ensure that children receive the right help at the right time.

Effective Early Help and Family Help rely upon agencies working together to:

- identify children and families who may benefit from additional support;
- assess strengths, needs, risks and protective factors;
- develop a coordinated plan of support;
- provide appropriate interventions to meet identified needs;
- review progress and outcomes regularly; and
- escalate concerns where risks increase or needs are not being met.

Schools are well placed to identify emerging concerns and provide support before difficulties escalate. The school operates a whole-school approach to safeguarding, wellbeing, attendance and inclusion that enables staff to identify children who may require additional help and support at an early stage.

At The Willows School, safeguarding, attendance, behaviour, wellbeing and welfare concerns are reviewed regularly by relevant staff, including the Designated Safeguarding Lead (DSL). Information from a range of sources is considered to identify patterns, emerging concerns and unmet needs. This information will inform decisions regarding support, intervention and referral pathways.

Where concerns are identified, support may initially be provided through school-based interventions, including:

- pastoral support;
- emotional wellbeing support;
- attendance support;
- behaviour support;
- SEND support and reasonable adjustments;
- mental health interventions;
- family engagement; and
- targeted educational support.

Where additional support is required, the DSL will consider whether a Family Help or Early Help assessment should be initiated and will liaise with relevant agencies to coordinate support. The DSL may delegate aspects of this work to another suitably trained member of staff, including acting as Lead Professional where appropriate. Responsibility for oversight of safeguarding and child welfare will remain with the DSL.

All Early Help and Family Help arrangements will be kept under review. Where a child's circumstances do not improve, where concerns escalate, or where there is evidence that a child may be suffering or likely to suffer significant harm, the DSL will consider whether a referral to Children's Social Care is required.

The school will seek to work in partnership with children, parents/carers and other professionals in accordance with local safeguarding partnership procedures and information-sharing protocols. The child's welfare and best interests will remain central to all decision-making.

Children Who May Benefit from Early Help or Family Help

While any child may benefit from Early Help or Family Help services, staff should be particularly alert to the potential need for additional support where a child:

- has a disability, medical condition or additional needs;
- has special educational needs and/or disabilities (SEND), whether or not they have an Education, Health and Care Plan (EHCP);
- has mental health, emotional wellbeing or behavioural needs;
- is a young carer;
- has a social worker or has previously had a social worker;
- is looked after, previously looked after or living in kinship care arrangements;

- is frequently absent from education, persistently absent, or missing from education, home or care;
- has experienced multiple suspensions, is at risk of exclusion, attends alternative provision or a pupil referral unit;
- is showing signs of being drawn into criminality, anti-social behaviour, serious violence, gangs, organised crime or county lines activity;
- is at risk of child criminal exploitation (CCE), child sexual exploitation (CSE), trafficking or modern slavery;
- is vulnerable to radicalisation or extremism;
- is vulnerable to online abuse, online exploitation, misinformation, disinformation or technology-facilitated harm;
- has a parent or carer in custody or is affected by parental offending;
- experiences challenging family circumstances, including domestic abuse, substance misuse, parental mental ill health, homelessness or housing instability;
- is misusing drugs or alcohol;
- is at risk of honour-based abuse, including forced marriage or female genital mutilation (FGM);
- is privately fostered; or
- is experiencing multiple vulnerabilities or cumulative harm.

Reporting Concerns

All staff, volunteers, supply staff, agency staff, contractors and visitors have a responsibility to raise concerns. Staff should not assume that another person will take action and should report any concerns, regardless of how minor they may appear, to the DSL or Deputy DSL.

Individuals who are new to the school or working on a temporary basis may identify important safeguarding concerns and will therefore receive appropriate safeguarding information, including reporting procedures, safeguarding contacts and relevant safeguarding expectations as part of their induction or day-one safeguarding briefing.

Staff may be asked to contribute to Family Help assessments, meetings or reviews and should cooperate fully with multi-agency safeguarding processes. Any member of staff who believes that a child or family may benefit from additional support should discuss this with the DSL or Deputy DSL without delay.

Where a child's needs can be met without statutory social work involvement, the school will support access to appropriate Early Help or Family Help services, including services provided through Lancashire's Children and Family Wellbeing Service and other local support agencies.

2.14 Recording Decision Making Rationales and communications with parents/ carers/ professionals

The school recognises that high-quality safeguarding records are essential to effective safeguarding practice. Accurate, timely and comprehensive recording supports sound professional decision-making, facilitates information sharing, evidences actions taken and promotes the safety and welfare of children. In accordance with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), all safeguarding records must be clear, factual, child-centred and capable of demonstrating the rationale behind decisions made.

The Designated Safeguarding Lead (DSL) and Deputy DSLs will ensure that all safeguarding concerns, disclosures, incidents, assessments, referrals and interventions are recorded accurately, securely and without delay.

Safeguarding records will include:

- how the concern came to light, including the source of the information;
- the nature of the concern and any presenting risks;

- the child's wishes, views and lived experience where these are known;
- actions taken in response to the concern;
- discussions held with the child, parents/carers, staff and other professionals;
- referrals made and the outcomes of those referrals;
- decisions taken and by whom;
- professional advice obtained;
- any challenge, escalation or professional disagreement;
- review arrangements and follow-up actions;
- the outcome of interventions; and
- the rationale underpinning all significant safeguarding decisions.

Decision-making records should clearly demonstrate:

- consideration of the child's safety, welfare and best interests;
- assessment of both risk and need;
- consideration of the child's individual vulnerabilities and protective factors;
- application of local threshold guidance and referral criteria;
- consideration of contextual safeguarding factors, including risks arising within family, peer, community or online environments;
- whether Family Help, Early Help, Child in Need, Child Protection or other interventions were considered;
- why a referral was made or not made;
- the reasons for any decisions not to take further action; and
- how professional judgement was reached.

Records should evidence professional curiosity, analysis and, where appropriate, respectful professional challenge. The DSL should ensure that assumptions are avoided and that records distinguish clearly between fact, observation, opinion and third-party information.

The DSL or Deputy DSL will maintain safeguarding records within the school's secure safeguarding recording system and ensure that records contribute to a clear, accurate and coherent chronology of significant events, concerns, actions and outcomes for each child. Safeguarding records will be retained and transferred in accordance with statutory guidance, local safeguarding procedures, the Data Protection Act 2018 and UK GDPR requirements.

Recording Communications and Information Sharing

All safeguarding-related discussions and communications with children, parents/carers, professionals and agencies must be recorded as soon as practicable and, wherever possible, on the same working day. Any delay in recording should be exceptional and justified.

Records of communication should include:

- the date and time of the contact;
- the method of communication;
- the full name, role and organisation of individuals involved;
- the information shared or received;
- decisions made;
- agreed actions;
- timescales for follow-up; and
- any professional advice provided.

A clear audit trail of information sharing will be maintained. Records should include:

- what information was shared;
- with whom it was shared;
- the lawful basis for sharing;
- whether consent was sought and obtained, where appropriate;
- where consent was not sought or not obtained, the reasons for this decision;
- how the sharing was considered necessary and proportionate; and
- how the sharing supported the safeguarding and welfare of the child.

The school will ensure that all safeguarding recording and information-sharing practices comply with:

- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- local safeguarding partnership procedures;
- the Data Protection Act 2018;
- UK GDPR;
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers; and
- the school's Data Protection and Records Management Policies.

All safeguarding records will be treated as confidential and shared only on a strict need-to-know basis, whilst recognising that effective information sharing is critical to keeping children safe and promoting their welfare.

2.15 CSC Responses and Timescales for Referrals and Timescales

Following a referral to Children's Social Care (CSC), the local authority should make a decision about the type of response required and communicate this to the referrer in accordance with local safeguarding procedures and statutory guidance. The school recognises that timely decision-making, information sharing and multi-agency collaboration are essential to safeguarding children and ensuring that they receive the right help at the right time.

Where a referral is made, Children's Social Care should acknowledge receipt and determine the appropriate course of action. The DSL will ensure that all referrals, decisions, outcomes and communications are recorded on the school's safeguarding recording system.

Possible responses from Children's Social Care may include:

- no further action by Children's Social Care, with advice provided to the referrer where appropriate;
- provision of support through Family Help, Early Help or other targeted intervention services;
- signposting or referral to another agency or support service;
- undertaking a Child and Family Assessment;
- initiating Child in Need support under Section 17 of the Children Act 1989;
- commencing enquiries under Section 47 of the Children Act 1989 where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm;
- convening a Strategy Discussion or Strategy Meeting involving relevant agencies;
- convening an Initial Child Protection Conference where the Section 47 enquiry indicates that a Child Protection Plan should be considered;
- accommodating a child under Section 20 of the Children Act 1989 where appropriate and with the necessary consent requirements;
- initiating pre-proceedings or making an application to the Family Court where statutory intervention is required to safeguard the child.

The school acknowledges that statutory timescales may be subject to amendment through legislation, local procedures and national guidance. The DSL will therefore refer to current Lancashire Children's Safeguarding Assurance Partnership procedures and Children's Social Care guidance when considering expected timescales and escalation requirements.

Feedback from Children's Social Care

The DSL or referrer should expect confirmation that a referral has been received and should be informed of the outcome of the referral where appropriate and lawful to do so. Effective information sharing between agencies is essential in ensuring that children receive appropriate support and protection.

If the DSL or the person making the referral has not received acknowledgement or feedback within locally agreed timescales, they should actively follow up the referral and challenge any delay where necessary. Staff should never assume that action has been taken simply because a referral has been submitted.

The DSL will ensure that:

- referrals are monitored until an outcome is confirmed;
- all discussions, decisions and outcomes are recorded;
- professional curiosity and challenge are exercised where required;
- the child's welfare remains central to all actions and decisions; and
- escalation procedures are followed where there are concerns regarding delay, inaction or decision-making.

Professional Challenge and Escalation

Where the DSL, Deputy DSL or other member of staff disagrees with a decision made by Children's Social Care or another agency, or believes that a child's needs are not being appropriately assessed or addressed, they should not accept the decision without appropriate scrutiny and challenge. Effective safeguarding practice requires constructive professional challenge where there are concerns regarding a child's welfare or safety.

The school will follow the Lancashire Children's Safeguarding Assurance Partnership Professional Escalation and Conflict Resolution Procedures where:

- there is disagreement regarding thresholds or decision-making;
- a referral has been declined and safeguarding concerns remain;
- there are concerns about delays in assessment or intervention;
- agencies are unable to agree on a safeguarding plan;
- there are concerns about the effectiveness of multi-agency safeguarding arrangements; or
- a child's welfare is not being adequately safeguarded.

Where a case is already open to Children's Social Care and professional disagreements arise regarding risk, planning or case management, the DSL will utilise local escalation procedures to seek resolution at the earliest opportunity and ensure that the child's safety and welfare remain the primary consideration.

All professional challenges, escalation activity, outcomes and agreed actions must be clearly documented within the child's safeguarding record, including the rationale for any decisions taken.

2.16 Recording and Reporting Concerns in the school

All staff, volunteers, agency staff, contractors and visitors have a responsibility to act immediately if they have a concern about a child. Any concern relating to a child's welfare, safety or wellbeing must be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay. Safeguarding is everyone's responsibility and no concern should be ignored, minimised or assumed to have been reported by someone else. Staff should maintain an attitude of "*it could happen here*" and always act in the best interests of the child.

The school recognises that accurate, timely and high-quality record keeping is a fundamental part of effective safeguarding practice. Comprehensive records support the early identification of need and risk, facilitate effective information sharing, inform decision-making, support multi-agency working, provide evidence of safeguarding actions and enable safeguarding concerns to be monitored over time.

Accurate safeguarding records are important because they:

- support the early identification of emerging safeguarding concerns and patterns of risk;
- ensure that seemingly minor concerns can be considered within the wider context of a child's lived experience and safeguarding history;
- support effective safeguarding decision-making and professional judgement;
- assist the school in monitoring, reviewing and improving safeguarding practice;
- provide evidence of safeguarding actions, professional challenge, decision-making and referrals;
- contribute to safeguarding chronologies and multi-agency assessments;
- support inspections, audits, reviews and safeguarding quality assurance processes; and
- may form part of statutory assessments, legal proceedings, child protection processes, serious case reviews or coronial investigations.

All safeguarding concerns must be recorded as soon as possible and, wherever practicable, on the same working day. In all circumstances, concerns must be recorded before the end of the working day on which the concern arose or was disclosed.

Branches Education Group Staff

Staff with access to the school's safeguarding recording system must:

- report concerns verbally to the DSL or Deputy DSL as soon as possible;
- record concerns on CPOMS before the end of the working day;
- complete all relevant sections of the safeguarding record;
- record information accurately, factually and in sufficient detail;
- use the child's own words wherever possible when recording disclosures or verbal accounts;
- distinguish clearly between facts, observations, professional opinion and information received from others;
- record dates, times, locations, actions taken and persons involved;
- complete the body map and injury recording sections where relevant;
- describe injuries factually, including approximate size, colour, location and appearance;
- number injuries consistently where using body maps and associated written records; and
- ensure records are completed promptly and accurately.

Staff must not:

- investigate concerns themselves;
- speculate about the cause of injuries or behaviours;
- ask leading questions;
- alter, amend or retrospectively change records without explanation;
- take photographs of injuries unless specifically authorised through safeguarding procedures;
- record concerns on behalf of another person;
- rely upon second-hand accounts where the original observer can provide a direct record;
- store safeguarding information on personal devices; or
- submit safeguarding concerns solely by email where this may delay action or risk the concern being overlooked.

Where handwritten notes are made during or immediately following a disclosure, staff should sign and date the notes, record the child's name and date of birth where known, and provide the original notes to the DSL for secure retention within the safeguarding record.

Agency Staff, Supply Staff, Contractors and Volunteers

Agency staff, supply staff, contractors and volunteers who do not have access to CPOMS must:

- report concerns immediately to the DSL or Deputy DSL;
- complete the school's safeguarding concern recording documentation, including body map templates where appropriate;
- submit records before leaving the school site whenever possible and always before the end of the working day; and
- seek support from the DSL, Deputy DSL or Headteacher if assistance is required.

Immediate Reporting Requirement

Where any member of staff has concerns about a child's welfare, they must act immediately by reporting those concerns to the DSL or Deputy DSL. Staff should never assume that concerns are insignificant or that another person will take responsibility. Sharing concerns at an early stage may prevent harm and ensure that children receive support at the earliest opportunity.

Concerns That Must Always Be Reported Immediately

The following concerns must always be brought to the attention of the DSL or Deputy DSL without delay. This list is not exhaustive:

- any unexplained injury, bruise, burn, mark or physical concern;
- explanations for injuries that are inconsistent, implausible, changing or do not match the child's presentation;
- disclosures, allegations or indications of abuse, neglect or exploitation;
- concerns relating to child-on-child abuse, sexual harassment or sexual violence;
- harmful sexual behaviour;
- signs of child criminal exploitation (CCE) or child sexual exploitation (CSE);
- indicators of domestic abuse, coercive control or family dysfunction;
- concerns regarding radicalisation or extremism;
- online safety concerns, including online grooming, exploitation, AI-enabled abuse, inappropriate online behaviour and technology-facilitated harm;
- the creation, possession or sharing of nude or semi-nude images/videos;
- significant changes in behaviour, presentation, emotional wellbeing, attendance or engagement;
- concerning drawings, writings, online activity or play behaviours;
- concerns that a child may be experiencing neglect or receiving inadequate care;
- concerns arising from a child's return from home, respite care, hospital, transport arrangements or another setting;
- concerns regarding children missing education or persistent absence;
- excessive, unusual or inappropriate one-to-one contact between an adult and a child;
- low-level concerns or allegations regarding adults working with children; and
- any matter that causes professional unease, concern or a safeguarding "niggle", even where there is limited information available.

All safeguarding concerns, discussions, decisions, actions and outcomes must be clearly documented to create an accurate chronology and to ensure that children receive the right help, support and protection at the right time.

2.17 Listening to Children and Managing Disclosures

The school is committed to ensuring that children are listened to, respected and taken seriously. Safeguarding practice at The Willows School is child-centred and recognises that understanding the voice, wishes, feelings and lived experiences of children is essential to promoting their safety, welfare and wellbeing. All children have the right to be heard and to have their concerns taken seriously.

Staff should refer to Appendix 4 - Listening and Recording Guidance for detailed advice on responding to children who are worried, distressed, making a disclosure or seeking support.

Children Must Be Listened To

Children must be listened to.
They must be taken seriously.
They must be heard.

There are no exceptions to this principle. Children need to know that adults will listen to them, respond appropriately to their concerns and take action where necessary to keep them safe. Staff should create environments where children feel valued, respected and able to express their views, worries and experiences.

Children may not always communicate concerns directly and may disclose abuse, neglect or exploitation in a variety of ways, including through:

- verbal disclosures;
- changes in behaviour or presentation;
- play, drawings or written work;
- online activity;
- emotional responses; or
- indirect comments or hints.

Staff should be aware that children may not recognise that what is happening to them is abuse, neglect or exploitation and may find it difficult to talk about their experiences because of fear, shame, loyalty, trauma, disability, communication needs, language barriers or concerns about the consequences of speaking out.

Responding to a Disclosure

Where a child chooses to disclose information, staff should:

- remain calm, attentive and supportive;
- listen carefully without interrupting unnecessarily;
- take the child seriously;
- reassure the child that they have done the right thing by speaking out;
- allow the child to speak freely and at their own pace;
- use open questions only where clarification is required;
- avoid asking leading, probing or investigative questions;
- avoid expressing shock, disbelief or judgement;
- explain clearly that the information cannot be kept secret if someone is at risk of harm;
- reassure the child that information will only be shared with people who need to know in order to help keep them safe; and
- focus on the child's immediate safety and wellbeing.

Staff must not:

- promise confidentiality or secrecy;
- investigate the concern themselves;
- ask leading questions;
- press the child for additional information;
- make assumptions or interpretations;
- confront alleged perpetrators;
- criticise parents, carers or other individuals;
- speculate about what may have happened; or
- delay reporting the concern to the DSL.

Reporting and Recording

Following a disclosure, concern or safeguarding conversation, staff must:

- report the matter verbally to the Designated Safeguarding Lead (DSL) or Deputy DSL immediately;
- ensure that any urgent safeguarding concerns are communicated without delay;
- make a written record as soon as possible and always before the end of the working day;
- record the child's actual words wherever possible;
- distinguish clearly between facts, observations and professional opinion;
- record the date, time, location and people present;
- document any actions taken;
- record only what was seen, heard or observed; and
- submit the record through the school's safeguarding recording system in accordance with safeguarding procedures.

Records should be factual, accurate, objective and sufficiently detailed to support safeguarding decision-making. Staff should not record assumptions, opinions or interpretations as fact.

Child-Centred Practice

The school recognises that every child has a unique lived experience. Staff should actively seek to understand each child's wishes, feelings, communication needs and individual circumstances, particularly where children have SEND, disabilities, mental health needs, communication difficulties or other vulnerabilities that may affect their ability to communicate concerns.

All disclosures, safeguarding concerns and subsequent actions will be managed in accordance with:

- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- Lancashire Children's Safeguarding Assurance Partnership procedures;
- the school's Safeguarding and Child Protection Policy; and
- relevant information-sharing and data protection requirements.

The welfare of the child remains paramount at all times, and every disclosure or concern will be treated with appropriate seriousness, sensitivity and urgency.

3.0 CHILD ABUSE, NEGLECT and EXPLOITATION

Working Together to Safeguard Children 2026 defines safeguarding and child protection as activities undertaken to protect children from maltreatment, prevent impairment of health or development, ensure

children grow up with safe and effective care, provide help and support as soon as problems emerge, and enable children to achieve the best outcomes. **Keeping Children Safe in Education (KCSIE) 2026** reinforces that abuse, neglect and exploitation are safeguarding concerns that can affect any child and that children may experience multiple and overlapping forms of harm.

A person may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Abuse, neglect and exploitation can occur:

- within the family, institution, community or wider society;
- through the actions of adults or other children;
- online, offline, or through a combination of both;
- through direct contact, technology-facilitated contact or remote communication; and
- by individuals known to the child or, more rarely, by strangers.

The school recognises that abuse, neglect and exploitation rarely occur in isolation. Children may experience multiple forms of harm simultaneously and safeguarding concerns often overlap. Effective safeguarding practice therefore requires staff to consider the whole child, their lived experience, vulnerabilities and wider circumstances when assessing risk and need.

All staff understand that safeguarding concerns may arise both within and beyond the family environment. Abuse and exploitation may occur within peer groups, communities, educational settings and online environments. Staff will therefore consider the possibility of **extra-familial harm** and **contextual safeguarding risks** when assessing concerns about a child.

Examples of extra-familial harm may include:

- child sexual exploitation (CSE);
- child criminal exploitation (CCE), including county lines;
- serious violence;
- gang involvement;
- peer-on-peer abuse;
- harmful sexual behaviour;
- online abuse and exploitation;
- radicalisation and extremism;
- trafficking and modern slavery; and
- abuse occurring within social groups, neighbourhoods or online communities.

The school recognises that technology is a significant factor in many safeguarding concerns. Children may experience abuse wholly online, offline, or through a combination of both. Technology can facilitate abuse, exploitation, coercion, bullying, harassment and grooming. Staff will remain alert to risks associated with:

- online grooming;
- cyberbullying;
- child sexual exploitation;
- sharing of nude and semi-nude images or videos;
- online coercion and blackmail;

- harmful online content;
- misinformation, disinformation and conspiracy-based harms;
- live-streamed abuse;
- technology-assisted abuse;
- artificial intelligence (AI) generated abuse and exploitation; and
- other emerging online safeguarding risks.

All staff are well placed to observe changes in children's presentation, behaviour, attendance, wellbeing and relationships. Staff should remain professionally curious and alert to signs that may indicate abuse, neglect, exploitation or emerging safeguarding concerns. Any unexplained or concerning change in a child's baseline presentation, behaviour, physical appearance, emotional wellbeing or attendance pattern must be discussed with the Designated Safeguarding Lead (DSL) without delay.

The Impact of Adversity and Cumulative Harm

The school recognises that adverse childhood experiences, trauma, neglect and abuse can significantly affect children's emotional wellbeing, mental health, development, behaviour and educational outcomes. Staff should be aware that safeguarding concerns may present through attendance difficulties, communication changes, emotional distress, self-harm, anxiety, challenging behaviour or withdrawal.

Children may also experience multiple and cumulative harms. The presence of one safeguarding concern should not prevent consideration of others. Staff should always consider the broader context of a child's life and whether additional vulnerabilities or risks may be present.

The "Toxic Trio"

Staff should be aware of the well-established link between:

- parental substance misuse, including alcohol misuse;
- parental mental ill health; and
- domestic abuse, including coercive and controlling behaviour.

These factors, commonly referred to as the "**Toxic Trio**", can significantly impact parenting capacity, family functioning and child wellbeing. The presence of one or more of these factors may increase the likelihood of abuse, neglect, emotional harm or unmet need. Staff should remain alert to these issues and ensure that concerns are discussed with the DSL and considered within safeguarding assessments and support plans.

Where appropriate, the school will work with families, Family Help services, Children's Social Care and other agencies to ensure that children affected by parental vulnerabilities receive timely support and protection.

Additional Vulnerabilities

The school recognises that some children may be at increased risk of abuse, neglect or exploitation, including children who:

- have SEND or disabilities;
- have a social worker or have previously had a social worker;
- are looked after, previously looked after or living in kinship care;
- experience mental health difficulties;
- are young carers;
- are persistently absent or missing from education; or

- are exposed to multiple vulnerabilities and adversities.

Staff must remain vigilant to indicators of need, risk and harm and ensure timely reporting of all safeguarding concerns.

Definitions of Abuse, Neglect and Exploitation: See **Appendix 5**

Indicators of Abuse, Neglect and Exploitation: See **Appendix 6**.

3.2 Extra-Familial Harm and Contextual Safeguarding

The school recognises that safeguarding risks can occur both within and beyond the family home and that children may be vulnerable to abuse, neglect, exploitation and other forms of harm in a range of settings, including within peer groups, schools, communities and online environments. In accordance with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), all safeguarding assessments and interventions will consider the wider context of a child's life and experiences.

The school adopts a contextual safeguarding approach and recognises that risks to children can arise from influences and environments beyond those associated with parents or carers. These risks may occur independently of family circumstances or alongside concerns within the family home. Staff will remain professionally curious and alert to indicators that a child may be experiencing harm in any aspect of their life.

All staff, particularly the Designated Safeguarding Lead (DSL) and Deputy DSLs, will consider the full context of a child's circumstances when assessing risk, determining need and planning support. Effective safeguarding requires an understanding of the child's relationships, peer networks, community influences, online activity and wider environmental factors.

The school recognises that extra-familial harms often overlap and that children may experience multiple vulnerabilities and forms of exploitation simultaneously. Concerns may require coordinated assessment, information sharing and intervention from a range of agencies and professionals.

Staff will be vigilant to signs that a child may be experiencing or be at risk of extra-familial harm, exploitation or abuse. Indicators may include:

- significant or unexplained changes in behaviour, presentation or emotional wellbeing;
- unexplained injuries or possessions;
- changes in friendship groups or peer associations;
- increased secrecy or withdrawal;
- indicators of exploitation or coercion;
- online safety concerns;
- repeated missing episodes from home, education or care;
- persistent absence, reduced attendance or patterns of disengagement from education;
- involvement in anti-social behaviour, criminal activity or serious violence; and
- changes in appearance, relationships, communication or use of technology.

The school recognises that attendance concerns may be indicators of wider safeguarding risks. Absence from education, persistent absence, repeated lateness and disengagement from school will be considered within the safeguarding context and explored with appropriate professional curiosity.

Extra-familial harms can take many forms and may include, but are not limited to:

- child sexual abuse;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE), including county lines activity;

- peer-on-peer (child-on-child) abuse;
- harmful sexual behaviour;
- sexual violence and sexual harassment;
- serious youth violence;
- gang association or organised criminal activity;
- domestic abuse within adolescent and intimate relationships;
- coercive and controlling behaviour;
- online abuse and online exploitation;
- grooming;
- trafficking and modern slavery;
- radicalisation and extremism;
- discriminatory abuse, including racist, homophobic, biphobic, transphobic and disability-related abuse;
- violence against women and girls (VAWG);
- misogyny; and
- technology-facilitated abuse, including AI-enabled abuse and exploitation.

Where concerns relating to extra-familial harm are identified, the school will work collaboratively with children, families, safeguarding partners, Children's Social Care, the Police and other relevant agencies to ensure appropriate assessment, intervention and support. Information will be shared lawfully, proportionately and in accordance with safeguarding and data protection requirements.

The DSL will ensure that contextual factors, including peer relationships, community influences, online activity, attendance patterns, behaviour and known vulnerabilities, are considered in safeguarding decision-making, risk assessments and referrals. Safeguarding responses will be tailored to the child's individual circumstances, needs and lived experiences to promote safety, wellbeing and positive outcomes.

The welfare of the child remains paramount, and all staff should be aware that safeguarding concerns may arise from any aspect of a child's life, both online and offline, inside and outside the home.

4.0 CHILDREN IN SPECIFIC CIRCUMSTANCES

4.1 So called 'Honour-based' Abuse

The school recognises that so-called '**Honour-Based' Abuse (HBA)** is a form of abuse that can affect children and young people and must be treated as a safeguarding concern. In accordance with **Keeping Children Safe in Education (2026)** and **Working Together to Safeguard Children (2026)**, staff will be alert to the risk of HBA and understand that it may involve a range of criminal offences and safeguarding concerns.

So-called honour-based abuse is an umbrella term used to describe incidents or crimes committed to protect or defend the perceived honour, status, reputation, values or beliefs of a family, community or social group. Such abuse may be justified by perpetrators as being necessary to preserve family or community honour and may be carried out by one individual or multiple perpetrators acting together.

HBA can affect children and young people of any gender, although girls and young women are disproportionately affected. Abuse may be perpetrated by parents, siblings, extended family members, carers or members of the wider community. It may occur in the United Kingdom or abroad and can involve substantial planning and collusion between multiple individuals.

Forms of HBA may include, but are not limited to:

- physical abuse;

- emotional or psychological abuse;
- coercive control;
- intimidation and threats;
- assault;
- unlawful imprisonment or restriction of liberty;
- forced marriage;
- female genital mutilation (FGM);
- breast ironing or breast flattening;
- sexual abuse;
- stalking and harassment;
- abandonment overseas; and
- in extreme circumstances, serious violence or murder.

The school recognises that HBA may be linked to other safeguarding concerns, particularly:

- forced marriage;
- female genital mutilation (FGM);
- domestic abuse;
- child sexual abuse;
- harmful cultural practices;
- coercive and controlling behaviour; and
- violence against women and girls (VAWG).

Staff should remain alert to indicators that a child may be at risk, including:

- expressed fear of family members or community members;
- restrictions on friendships or social activities;
- concerns regarding relationships or marriage;
- sudden withdrawal from education;
- extended trips abroad;
- requests for help that imply fear of family repercussions;
- self-harm or emotional distress linked to family expectations;
- reports from peers about threats or control; and
- disclosures relating to honour, shame or family reputation.

The One Chance Rule

The school recognises the importance of the "**One Chance Rule**". This principle acknowledges that professionals may have only one opportunity to speak with a child who is at risk of honour-based abuse and therefore may have only one opportunity to take effective action to protect them from harm. Staff must take all concerns seriously and act without delay.

Where a member of staff has concerns that a child may be experiencing, or is at risk of, honour-based abuse, they must:

- report the concern immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- make a clear and factual safeguarding record;
- avoid investigating the matter themselves;
- avoid mediation or family intervention;
- avoid contacting family members if doing so may place the child at increased risk;
- seek immediate safeguarding advice where necessary; and
- follow local safeguarding partnership procedures.

Responding to Concerns

Where concerns regarding actual or suspected honour-based abuse arise, the school will follow Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures and make referrals to Children's Social Care and/or the Police where appropriate. The child's safety, wishes and best interests will remain central to all decision-making.

The DSL will consider whether:

- the child is at immediate risk of harm;
- emergency safeguarding measures are required;
- a referral to Children's Social Care is necessary;
- Police involvement is required;
- specialist support services should be involved; and
- parental knowledge of the referral would increase risk to the child.

All concerns, decisions, referrals, actions and outcomes will be recorded in accordance with the school's safeguarding procedures and statutory guidance.

Further guidance: Lancashire CSAP procedures, KCSIE 2026, Working Together to Safeguard Children 2026, and local honour-based abuse safeguarding resources.

4.2 Forced Marriage

The school recognises that forced marriage is a form of child abuse and a serious abuse of human rights. A forced marriage occurs where one or both people do not, or cannot, consent to the marriage and pressure, coercion, threats or abuse are used to make the marriage take place. Forced marriage differs from an arranged marriage, where both parties have the free choice to accept or refuse the arrangement. Forced marriage can affect children of any gender and may occur in the United Kingdom or overseas.

In line with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), staff should understand that forced marriage is a safeguarding issue which may be associated with other forms of abuse, including domestic abuse, so-called honour-based abuse (HBA), child sexual abuse, sexual violence, emotional abuse, coercive control, child criminal exploitation, trafficking and modern slavery.

Forms of Abuse Associated with Forced Marriage

Forced marriage may involve a range of abusive behaviours including:

Emotional and Psychological Abuse

This may include:

- threats, intimidation, manipulation or coercion;
- isolation from friends, education or support networks;
- restrictions on freedom of movement;
- surveillance and monitoring;
- preventing access to education, health services or employment;
- preventing a child from communicating with professionals independently;
- threats of self-harm or suicide by family members to pressure compliance;
- shaming, humiliation or ostracisation by family or community members; and
- threats relating to immigration status, family relationships or cultural expectations.

Physical Abuse

This may include:

- intimidation and threats of violence;
- physical assault;
- unlawful restraint or imprisonment;
- abduction;
- assault by multiple family or community members;
- serious violence; and
- in extreme cases, homicide.

Sexual Abuse

Forced marriage may be associated with:

- rape;
- sexual assault;
- unwanted sexual activity;
- coercive sexual relationships;
- abduction for the purposes of marriage;
- forced pregnancy; and
- other forms of sexual violence and exploitation.

Financial Abuse

This may include:

- controlling access to money;
- withholding earnings or benefits;
- creating financial dependency;
- restricting access to employment or education; and
- economic exploitation.

Warning Signs and Indicators

Staff should be alert to indicators that a child may be at risk of forced marriage, including:

- extended or unexplained absence from school;
- sudden decline in attendance or engagement;
- anxiety regarding forthcoming travel abroad;
- discussions concerning marriage or engagement at an unusually young age;
- excessive parental control;
- restrictions on the child's social activities or friendships;
- fear of family members;
- self-harm, depression or suicidal thoughts;
- running away from home;
- siblings who have experienced forced marriage; or
- disclosures relating to honour, family expectations or pressure to marry.

Confidentiality and Information Sharing

Concerns relating to forced marriage require particularly careful handling. Staff must understand that the risk to a child can escalate very rapidly if family members become aware that concerns have been raised. Information must therefore be shared strictly on a need-to-know basis and in accordance with safeguarding procedures.

Staff must not:

- attempt family mediation;
- contact family members to discuss concerns;
- approach community leaders;
- send the child home to discuss concerns with family members;
- share information with anyone who may increase the risk to the child; or
- investigate concerns themselves.

Particular care should be taken regarding the use of interpreters. Family members, friends, community members or individuals connected to the family must not be used as interpreters in cases where forced marriage is suspected.

Responding to Concerns

Where a member of staff has concerns that a child may be at risk of forced marriage, they must:

- report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- make a factual safeguarding record without delay;
- follow local safeguarding partnership procedures;
- seek immediate advice from Children's Social Care and/or the Police where appropriate; and
- treat the matter as a child protection concern.

The DSL will consider whether:

- the child is at immediate risk of harm;
- emergency safeguarding action is required;
- a referral to Children's Social Care is necessary;
- Police involvement is required;
- specialist forced marriage services should be consulted; and
- informing parents or carers would place the child at increased risk.

Forced Marriage Unit (FMU)

The school will seek advice from the Forced Marriage Unit (FMU) where appropriate and follow national and local safeguarding guidance in all cases involving actual or suspected forced marriage.

Forced Marriage Unit (FMU)

Telephone: 020 7008 0151

Email: fmu@fcdof.gov.uk

The school will also follow:

- Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures;
- Multi-Agency Statutory Guidance for Dealing with Forced Marriage;
- Keeping Children Safe in Education (2026); and
- Working Together to Safeguard Children (2026).

The safety and welfare of the child will always be the paramount consideration.

4.3 Female Genital Mutilation (FGM)

The school recognises that Female Genital Mutilation (FGM) is a form of child abuse, violence against women and girls, and a serious safeguarding concern with potentially lifelong physical, emotional and psychological consequences. FGM is illegal in the United Kingdom and is a criminal offence under the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015). Keeping Children Safe in Education (2026) identifies FGM as a specific safeguarding issue that all staff should be aware of.

FGM comprises all procedures involving the partial or total removal of, or other injury to, the external female genitalia for non-medical reasons. The practice is sometimes referred to as "cutting" and is often carried out on girls between infancy and adolescence, although it can occur at any age. There are no health benefits associated with FGM and the procedure can result in significant immediate and long-term harm.

The school recognises that some children and families may view FGM as a cultural, social or religious practice. However, FGM is child abuse, a violation of human rights and a criminal offence. These cultural beliefs can create barriers to disclosure and may prevent children from seeking help or recognising that they are at risk.

Risk Factors and Indicators

Staff should be alert to indicators that a child may be at risk of FGM, including:

- a family history of FGM;
- discussion of a planned special ceremony or event;
- a child expressing concern about an upcoming overseas trip;
- indications that a child is under pressure to conform to family or community expectations;
- prolonged or unexplained absence from school, particularly following travel abroad;
- older female relatives who have undergone FGM;
- a child discussing concerns about FGM in relation to themselves, siblings or peers; or
- requests for extended leave during term time linked to travel overseas.

Possible indicators that FGM may already have taken place include:

- difficulty walking, standing or sitting comfortably;
- spending longer than normal in the bathroom or toilet;
- repeated urinary, menstrual or genital health difficulties;
- reluctance to participate in physical activities;
- significant changes in behaviour following a period of absence; or
- a direct disclosure by the child.

Mandatory Reporting Duty

In accordance with the Serious Crime Act 2015, teachers have a statutory duty to report known cases of FGM in under-18s directly to the Police. This duty applies where a teacher:

- is informed by a girl under the age of 18 that an act of FGM has been carried out on her; or
- personally observes physical signs which appear to show that FGM has been carried out on a girl under the age of 18, and has no reason to believe that the procedure was necessary for medical reasons.

Where the mandatory reporting duty applies:

- the teacher must make a report directly to the Police as soon as possible, and normally within 24 hours;
- the teacher should also inform the Designated Safeguarding Lead (DSL), unless there is a compelling reason not to do so; and
- the DSL will ensure that Children's Social Care and other relevant agencies are involved as appropriate.

Where There Are Concerns About Risk of FGM

Where staff have concerns that a child may be at risk of FGM, but there is no direct disclosure or visual confirmation, the mandatory reporting duty does not apply. However, the concern must still be treated as a safeguarding matter.

In such circumstances, staff must:

- report concerns immediately to the DSL or Deputy DSL;
- make a clear and factual safeguarding record;
- avoid investigating the matter themselves;
- avoid contacting family members where this may increase risk to the child; and
- follow local safeguarding partnership procedures.

The DSL will consider:

- the level of risk to the child;
- whether an immediate referral to Children's Social Care is required;
- whether Police involvement is necessary;
- whether specialist advice should be sought; and
- whether informing parents/carers would place the child at greater risk of harm.

Information Sharing and Confidentiality

FGM concerns require careful and proportionate information sharing. Information will be shared only with those who need to know in order to safeguard the child. Staff should be mindful that discussing concerns inappropriately may increase risk and compromise safeguarding interventions.

All concerns, discussions, referrals, decisions and actions relating to FGM will be recorded promptly and securely on the school's safeguarding recording system in accordance with statutory guidance, local procedures and data protection requirements.

School Response

Where concerns relating to actual or suspected FGM are identified, the school will follow:

- Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures;
- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- Multi-Agency Statutory Guidance on Female Genital Mutilation; and
- relevant Home Office, Department for Education and safeguarding partner guidance.

The safety, welfare and best interests of the child will always be the paramount consideration.

4.4 Abuse Linked to Faith, Belief, Culture or Spiritual Practices

The school recognises that abuse linked to faith, belief, culture, spirituality, ritual practices, spirit possession, witchcraft or other supernatural beliefs is a form of child abuse and must be treated as a safeguarding concern. Such abuse can cause significant physical, emotional and psychological harm and may occur in families and communities from a wide range of cultural, ethnic, religious and social backgrounds. The abuse itself, rather than any particular faith or belief system, is the safeguarding concern.

The school acknowledges that beliefs relating to spirit possession, witchcraft, sorcery, the evil eye, demons, curses, black magic, djinns, voodoo, obeah, kindoki, ndoki and other supernatural influences are held in many communities throughout the world. The holding of such beliefs is not, in itself, evidence of abuse or neglect. Safeguarding concerns arise when those beliefs are used to justify harming, controlling, neglecting, exploiting, isolating or abusing a child.

Abuse linked to faith or belief may occur where a child is accused of:

- being possessed by spirits or demons;
- practising witchcraft or sorcery;
- bringing bad luck, misfortune or illness to others;
- being spiritually different or dangerous;
- causing family difficulties, illness, financial hardship or misfortune; or
- requiring punishment, cleansing, deliverance or exorcism.

The school also recognises that perpetrators may use faith, belief systems or spiritual practices to exert control over children and families and that such abuse may be linked to other safeguarding concerns, including:

- physical abuse;
- emotional abuse;
- neglect;
- child criminal exploitation;
- child sexual exploitation;
- domestic servitude;
- modern slavery;
- trafficking;
- forced marriage;
- honour-based abuse; and
- coercive and controlling behaviour.

Vulnerability

Children may become vulnerable where adults perceive them to be "different", difficult to manage or responsible for family or community difficulties. Allegations of possession or witchcraft are sometimes associated with:

- disability or special educational needs;
- neurodiversity;
- mental health difficulties;
- speech, language or communication needs;
- challenging behaviour;
- bedwetting or continence difficulties;
- medical conditions;
- bereavement;
- family breakdown; or
- perceived disobedience or independence.

The school recognises that abuse may be disguised as religious, cultural or spiritual intervention but remains abuse regardless of the explanation provided by those responsible.

Indicators of Abuse Linked to Faith or Belief

Staff should be alert to indicators that may suggest a child is experiencing abuse linked to faith or belief. Such indicators may include:

- a child reporting that they are possessed, cursed, evil or responsible for harm to others;
- disclosures that someone is attempting to remove spirits, demons or evil influences from them;
- references to exorcism, deliverance rituals or spiritual cleansing;
- signs of physical abuse, including bruising, burns, cuts or other injuries;
- fear of family members, religious leaders or community members;
- isolation within the home or community;
- deterioration in emotional wellbeing, presentation or behaviour;
- withdrawal, anxiety, depression or distress;
- neglect of personal care or hygiene;
- poor school attendance or sudden withdrawal from education;
- a decline in academic performance;
- a lack of parental warmth, attachment or concern;
- indications of exploitation, servitude or trafficking; and
- disclosures from siblings, peers or other professionals.

Staff should remember that these indicators are not exclusive to abuse linked to faith or belief and may also be associated with other forms of abuse, neglect or exploitation. Professional curiosity and a holistic assessment of the child's circumstances are essential.

Responding to Concerns

Where staff have concerns that a child may be experiencing abuse linked to faith, belief, culture, spirituality or ritual practices, they must:

- report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- make a clear, factual and timely safeguarding record;
- avoid investigating concerns themselves;
- avoid challenging, debating or dismissing family beliefs;
- focus on the child's safety and welfare;
- share information appropriately with safeguarding professionals; and
- follow local safeguarding partnership procedures.

The DSL will consider:

- whether the child is at immediate risk of harm;
- whether a referral to Children's Social Care is required;

- whether Police involvement is necessary;
- whether exploitation, trafficking or modern slavery concerns are present;
- whether specialist safeguarding advice is required; and
- whether informing parents or carers would increase risk to the child.

Multi-Agency Working

The school will work closely with Children's Social Care, the Police, Health Services and safeguarding partners where abuse linked to faith or belief is suspected. Information will be shared lawfully, proportionately and in accordance with safeguarding and data protection requirements.

Where concerns arise, the school will follow:

- Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures;
- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- national guidance on abuse linked to faith or belief; and
- relevant local safeguarding partnership protocols.

The welfare, safety and best interests of the child will always be the paramount consideration, regardless of cultural, religious or spiritual explanations offered for the abuse.

4.5 Child Sexual Exploitation (CSE)

The school recognises that Child Sexual Exploitation (CSE) is a form of child sexual abuse and a serious safeguarding concern. In line with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), staff should understand that CSE can affect any child or young person, regardless of age, gender, ethnicity, disability, sexual orientation, family background or circumstances. Children who are exploited may not recognise themselves as victims and may not disclose abuse.

Child Sexual Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- in exchange for something the child wants or needs; and/or
- for the financial advantage, status, power or gratification of the perpetrator or facilitator.

The child may have been sexually exploited even if the sexual activity appears consensual. Consent cannot be given to exploitation. CSE can occur between children and adults or between children and other children and may involve individuals acting alone or as part of organised networks or groups.

Child Sexual Exploitation may involve:

- contact sexual abuse, including penetrative and non-penetrative sexual activity;
- non-contact sexual abuse;
- grooming;
- coercion and manipulation;
- online sexual abuse and exploitation;
- production or sharing of indecent images;
- sexual extortion ("sextortion");
- live streaming of abuse;
- trafficking for sexual exploitation;
- exploitation linked to gangs or organised criminal groups; and

- technology-facilitated abuse, including the misuse of social media, messaging platforms, gaming platforms and emerging technologies.

The school recognises that CSE frequently occurs alongside other safeguarding concerns including:

- child criminal exploitation (CCE);
- serious violence;
- county lines activity;
- children missing education;
- domestic abuse;
- mental health concerns;
- substance misuse;
- online abuse;
- child-on-child abuse; and
- trafficking and modern slavery.

Through the curriculum and wider safeguarding programme, pupils will be supported to understand:

- healthy and respectful relationships;
- consent and personal boundaries;
- online safety;
- grooming and exploitation;
- sexual harassment and sexual violence;
- harmful sexual behaviour;
- the risks associated with sharing images online;
- how and where to seek help.

Any concerns regarding Child Sexual Exploitation must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. The DSL will follow Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures and make referrals to Children's Social Care, the Police and specialist exploitation services where appropriate.

The DSL will ensure that exploitation concerns are assessed within the wider safeguarding context and that consideration is given to:

- the child's vulnerabilities;
- peer relationships;
- online activity;
- family circumstances;
- attendance patterns;
- missing episodes;
- known perpetrators;
- contextual safeguarding risks; and
- indicators of both sexual and criminal exploitation.

The school recognises that some groups of children may be at greater risk of exploitation, including:

- children with SEND;
- children with communication difficulties;
- looked after children;
- previously looked after children;
- children living in kinship care arrangements;
- children who have or have previously had a social worker;
- children experiencing family difficulties;
- children who go missing from home, education or care; and

- children experiencing multiple vulnerabilities or adverse childhood experiences.

Indicators of Child Sexual Exploitation and Grooming

Staff should be aware that no single indicator proves that exploitation is occurring. However, the following signs may indicate risk and should always be reported to the DSL:

- unhealthy, age-inappropriate or concerning sexual behaviour;
- sexual harassment or harmful sexual behaviour;
- being secretive about relationships, online activity or whereabouts;
- significant changes in behaviour, mood or presentation;
- withdrawal from family or trusted adults;
- unexplained gifts, money, hotel cards, clothing, mobile phones or other possessions;
- physical signs of abuse or assault;
- sudden changes in appearance, dress or hygiene;
- alcohol or substance misuse;
- sexually transmitted infections;
- requests for contraception or emergency contraception that are unusual for the child;
- pregnancy;
- poor attendance, persistent absence or disengagement from education;
- repeated missing episodes from home, school or care;
- increased use of technology associated with concerning behaviour;
- online grooming, exploitation or sexual bullying;
- distrust of professionals or authority figures;
- relationships with significantly older individuals;
- staying out late or overnight without explanation;
- association with new peer groups that give cause for concern;
- involvement with gangs or anti-social groups;
- involvement in criminal activity;
- unexplained travel;
- emotional distress, anxiety, self-harm or low mood; and
- concerns regarding sexually explicit images, videos or online communications.

All concerns relating to Child Sexual Exploitation will be recorded, risk assessed, monitored and acted upon promptly. The school will work closely with children, families, Children's Social Care, the Police and partner agencies to ensure that children at risk of exploitation receive support, protection and intervention at the earliest possible opportunity.

The welfare and safety of the child will always be the paramount consideration.

4.6 Serious Violence

The school recognises that involvement in, or exposure to, serious violence can have a significant impact on a child's safety, welfare, physical health, emotional wellbeing and educational outcomes. In accordance with Keeping Children Safe in Education (2026), all staff should be aware of the indicators, risk factors and warning signs that may suggest a child is at risk of serious violence, criminal exploitation, gang involvement or associated harms.

The school adopts a preventative and child-centred approach to identifying and responding to concerns relating to serious violence. Staff will remain professionally curious and recognise that concerns relating to serious violence often overlap with other safeguarding risks, including child criminal exploitation (CCE), county lines activity, child sexual exploitation (CSE), missing episodes, substance misuse, domestic abuse, mental health difficulties and serious youth violence.

Indicators of Serious Violence

All staff should be aware of indicators that may signal that a child is at risk from, vulnerable to, or involved in serious violence. These indicators may include:

- increased absence, persistent absence or disengagement from education;
- a change in friendships, peer groups or associations with older individuals or groups;
- unexplained decline in academic performance, engagement or achievement;
- significant changes in behaviour, mood or emotional wellbeing;
- self-harm, risk-taking behaviour or mental health concerns;
- signs of assault, physical injury or unexplained injuries;
- unexplained gifts, money, clothing, mobile phones or other possessions;
- carrying weapons or discussing weapons;
- substance misuse or involvement in drug-related activity;
- repeated missing episodes from home, care or education;
- involvement in anti-social behaviour, gangs or organised criminal activity; and
- concerns relating to exploitation, intimidation, coercion or fear of others.

These indicators may suggest that a child has been approached by, groomed by or become involved with individuals associated with gangs, organised criminal groups, exploitation networks or serious violence.

Contextual Safeguarding

The school recognises that serious violence frequently occurs outside the family home and may be linked to peer groups, local communities, social media activity, criminal exploitation and wider contextual risks. Staff will consider the wider circumstances of the child and any environmental factors that may contribute to vulnerability or risk.

Responding to Concerns

Any concerns relating to serious violence, gang involvement, exploitation, weapons, criminal behaviour or related safeguarding issues must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. Concerns will be recorded and assessed in accordance with local safeguarding partnership procedures, Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026).

The DSL will consider:

- the level of risk to the child and others;
- whether there are indicators of child criminal exploitation (CCE);
- whether a referral to Children's Social Care is required;
- whether Police involvement is necessary;
- whether additional support through Family Help is appropriate; and
- the need for multi-agency safeguarding intervention.

Serious Violence Duty

The school is aware of the Serious Violence Duty introduced through the Police, Crime, Sentencing and Courts Act 2022 and will work collaboratively with safeguarding partners and relevant agencies to help prevent and reduce serious violence affecting children and young people. Serious violence is recognised as including a broad range of harmful behaviours and offences that can impact children's safety and wellbeing.

All concerns, discussions, decisions, referrals and actions relating to serious violence will be recorded on the school's safeguarding system and monitored by the DSL to ensure that children receive timely support, protection and intervention.

The welfare and safety of the child will remain the paramount consideration in all decisions relating to serious violence and associated safeguarding concerns.

4.7 Children affected by Gangs, Criminal Exploitation and Serious Youth Violence

The school recognises that children and young people may be vulnerable to gangs, serious youth violence, organised crime and criminal exploitation. In accordance with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), concerns relating to gang association, criminal exploitation and serious violence will be treated as safeguarding matters and responded to through a child-centred, multi-agency approach.

The school acknowledges that children may refer to groups using terms such as *family*, *crew*, *brethren*, *cousins* or other identifiers rather than referring to them as gangs. Staff should avoid assumptions and focus on behaviours, relationships, risks and vulnerabilities rather than labels.

The school recognises that gangs, organised criminal groups and criminal networks vary in structure and purpose. Some groups may be associated with:

- serious violence;
- child criminal exploitation (CCE);
- county lines activity;
- drug distribution;
- weapons carrying;
- robbery or acquisitive crime;
- child sexual exploitation (CSE);
- trafficking and modern slavery;
- intimidation and coercion; and
- other organised criminal activity.

Risks and Vulnerabilities

Children affected by gangs, criminal exploitation or serious youth violence may be at risk of significant harm as victims, witnesses, perpetrators, or through a combination of these experiences. The school recognises that exploited children should be viewed primarily as victims of abuse and exploitation, even where they appear to be involved in criminal behaviour.

Risk factors may include:

- previous experiences of trauma, abuse or neglect;
- family members involved in gangs or criminality;
- domestic abuse within the home;
- poverty, homelessness or social exclusion;
- adverse childhood experiences;
- poor attendance or exclusion from education;
- SEND or communication difficulties;
- mental health difficulties;
- substance misuse; and
- previous exploitation or involvement with criminal networks.

The school recognises that girls, boys and non-binary children may experience different forms of risk and exploitation. Girls may be particularly vulnerable to sexual exploitation, sexual violence, harmful sexual behaviour, coercive control and abuse linked to criminal groups. Boys may be less likely to disclose abuse and may be perceived as offenders when they are, in fact, victims of exploitation.

Indicators of Gang Involvement, Criminal Exploitation and Serious Youth Violence

Staff should remain alert to indicators that may suggest a child is vulnerable to, or involved in, gangs, criminal exploitation or serious violence. These may include:

- withdrawal from family members or trusted adults;
- significant changes in behaviour, presentation or emotional wellbeing;
- deterioration in school attendance, engagement or attainment;
- persistent absence or missing episodes;
- becoming emotionally withdrawn, anxious, fearful or angry;
- use of unfamiliar slang, terminology or hand signals;
- possession of unexplained money, gifts, clothing, mobile phones or other items;
- regular breaches of parental boundaries or staying out unusually late;
- sudden changes in appearance, including association with particular styles, colours or symbols;
- withdrawal from previously enjoyed activities;
- adoption of a new nickname or alias;
- unexplained injuries or reluctance to seek medical treatment;
- graffiti-style markings, symbols or tags on belongings;
- association with older individuals or groups;
- sudden changes in friendship groups;
- association with known gang members or individuals involved in criminal activity;
- travelling to unfamiliar locations;
- being found by Police far from home;
- carrying weapons or discussing weapons;
- involvement in substance misuse;
- expressing intimidating, violent or hostile attitudes towards others;
- fear of entering certain areas or travelling independently; and
- concerns relating to county lines activity or criminal exploitation.

Missing Episodes and County Lines

The school recognises the strong association between gang involvement, criminal exploitation, county lines activity and children who go missing from home, care or education. Missing episodes may indicate that a child is being exploited, transported or controlled by criminal groups. Particular care will be taken where a child:

- repeatedly goes missing;
- is found in locations distant from home;
- has unexplained travel arrangements;
- possesses train tickets, hotel cards or large amounts of cash;
- is reluctant to explain their whereabouts; or
- displays indicators of coercion, fear or control.

Responding to Concerns

Where concerns arise regarding gang involvement, criminal exploitation, county lines activity or serious youth violence, staff must:

- report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- create a clear and factual safeguarding record;
- avoid investigating concerns themselves;
- consider the possibility that the child may be a victim of exploitation;
- maintain professional curiosity; and
- follow safeguarding procedures without delay.
-

The DSL will:

- assess the level of risk and vulnerability;
- consider links to child criminal exploitation, child sexual exploitation and serious violence;
- liaise with Children's Social Care, the Police and relevant partner agencies;
- use local exploitation and vulnerability assessment tools where required;
- consider the need for Family Help, Child in Need or Child Protection intervention;
- contribute to multi-agency risk management arrangements; and
- ensure that appropriate support is provided to the child and family.

Where concerns relate to gang involvement, criminal exploitation or youth violence, the school will follow Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures, local exploitation pathways, risk assessment processes and statutory safeguarding guidance.

The school recognises that children involved in gangs or criminal activity may themselves be victims of abuse, coercion and exploitation. The safety, welfare and best interests of the child will remain the paramount consideration in all safeguarding decisions.

4.8 Child Criminal Exploitation (CCE) and County Lines

The school recognises that Child Criminal Exploitation (CCE) is a form of child abuse and is a significant safeguarding concern. In accordance with Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children 2026, staff should understand that children involved in criminal exploitation are victims of abuse, even where they appear to participate willingly in criminal activity. Exploitation often involves coercion, control, manipulation, intimidation, threats, violence and the abuse of power. Children may not recognise that they are being exploited and may not disclose their experiences.

Definition of Child Criminal Exploitation (CCE)

Child Criminal Exploitation occurs where an individual, group, gang or organised criminal network takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity:

- in exchange for something the child needs or wants; and/or
- for the financial, criminal, status-related or other advantage of the perpetrator or facilitator; and/or
- through violence, threats, intimidation, debt bondage, coercion or other forms of control.

The child may have been criminally exploited even where the activity appears consensual. CCE can occur through direct contact, online activity or a combination of both and may involve a single incident or a pattern of exploitation over time.

CCE can include, but is not limited to:

- county lines drug distribution;
- transporting drugs, money or weapons;
- forced shoplifting or theft;
- burglary or robbery;
- carrying weapons;
- fraud, cybercrime or online offending;
- working in cannabis cultivation;
- forced begging;
- money laundering;
- intimidation or violence against others; and
- other criminal activity undertaken for the benefit of another individual or group.

Risks Associated with Child Criminal Exploitation

Children involved in CCE may experience significant physical, emotional, psychological and educational harm. Risks may include:

- threats, intimidation, coercion and blackmail;
- physical assault and serious violence;
- sexual abuse and sexual exploitation;
- emotional abuse and trauma;
- substance misuse;
- debt bondage and financial exploitation;
- criminalisation and arrest;
- carrying weapons;
- exposure to organised crime;
- isolation from family and support networks;
- being unable to leave exploitative relationships safely;
- serious injury or death; and
- long-term impacts on education, health, relationships and future opportunities.

The school recognises that children who appear to be offending may in fact be victims of exploitation and abuse.

County Lines

County Lines is a form of Child Criminal Exploitation and involves organised criminal networks exporting and supplying illegal drugs from one area to another using dedicated mobile phone lines or other communication methods.

County lines activity commonly involves:

- the movement of drugs and money across geographical areas;
- exploitation of children and vulnerable adults to facilitate criminal activity;
- use of coercion, intimidation, violence and threats;
- grooming and manipulation of children;
- use of weapons, including knives and firearms;
- sexual violence and sexual exploitation;
- missing episodes from home, care or education;
- modern slavery and trafficking; and
- the takeover of vulnerable adults' homes, commonly known as "cuckooing".

The school recognises that county lines is a complex safeguarding issue that intersects with criminal exploitation, serious violence, child sexual exploitation, modern slavery, trafficking and missing children.

Indicators of Child Criminal Exploitation and County Lines

Staff should be aware that no single indicator confirms exploitation; however, the following may suggest a child is vulnerable to or involved in CCE or county lines activity:

- repeated missing episodes from home, care or education;
- being found outside their home area without a credible explanation;
- unexplained acquisition of money, clothing, mobile phones or other items;
- possession of multiple phones or SIM cards;
- excessive phone calls, messages or social media activity;
- association with older individuals or controlling peer groups;
- unexplained travel patterns;

- leaving home or care without explanation;
- carrying drugs, money or weapons;
- unexplained injuries or signs of assault;
- reluctance to explain injuries or activities;
- decline in attendance, punctuality or academic achievement;
- emotional distress, anxiety, self-harm or significant changes in wellbeing;
- gang association;
- isolation from previous friendship groups;
- increased secrecy or use of unfamiliar terminology;
- substance misuse; and
- concerns raised by parents, carers or other agencies.

Contextual Safeguarding

The school recognises that CCE and county lines frequently occur outside the family home and are often linked to peer groups, communities, transport networks and online environments. The Designated Safeguarding Lead (DSL) will ensure that contextual safeguarding factors are considered within all assessments, referrals and intervention plans.

Responding to Concerns

Any concerns regarding Child Criminal Exploitation, county lines activity, gang association, serious violence or related risks must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

The DSL will:

- assess the level of risk and vulnerability;
- consider whether the child is a victim of criminal exploitation;
- utilise local exploitation screening and risk assessment tools where appropriate;
- make referrals to Children's Social Care and/or the Police where required;
- liaise with safeguarding partners and specialist exploitation services;
- consider the need for Family Help, Child in Need or Child Protection intervention;
- coordinate multi-agency safeguarding support; and
- ensure that all concerns, actions and outcomes are fully recorded.

Common Terminology

Staff may encounter terminology associated with criminal exploitation and county lines activity, including:

- Cuckooing: taking over the home of a vulnerable person to facilitate criminal activity.
- County Lines / Going Country: travelling to another location to supply drugs or move criminal proceeds.
- Trapping: supplying or transporting drugs.
- Trap House: a location used for drug supply, storage or associated criminal activity.
- Trap Line: a dedicated phone line used to coordinate drug distribution.

Staff should not assume that children using such terminology are necessarily involved in criminal activity; however, the language may provide useful context for safeguarding assessments.

Multi-Agency Working

Where concerns regarding child criminal exploitation or county lines are identified, the school will work closely with:

- Children's Social Care;

- the Police;
- Youth Justice Services;
- Health Services;
- Family Help Services;
- safeguarding partners; and
- specialist exploitation teams.

The school will follow Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures, local exploitation pathways and national statutory guidance.

The welfare, safety and best interests of the child will remain the paramount consideration. Children affected by criminal exploitation will be viewed as victims of abuse and supported through appropriate safeguarding and multi-agency intervention.

4.9 Modern Slavery and Human Trafficking

The school recognises that modern slavery, human trafficking and exploitation are forms of child abuse and serious safeguarding concerns. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the Modern Slavery Act 2015 and local safeguarding partnership procedures, all staff should be alert to the possibility that a child may be a victim of trafficking, slavery, servitude, forced or compulsory labour, domestic servitude, criminal exploitation or sexual exploitation. Children who are victims of exploitation should be recognised primarily as victims of abuse and not treated as offenders.

Modern slavery is a form of organised abuse in which individuals, including children, are recruited, transported, transferred, harboured or controlled for the purpose of exploitation. Exploitation may occur within the United Kingdom or across international borders and can affect children of any age, gender, ethnicity, nationality or background.

The Modern Slavery Act 2015 includes offences relating to:

- human trafficking;
- slavery;
- servitude; and
- forced or compulsory labour.

The school recognises that slavery, trafficking and exploitation are often linked to other safeguarding concerns, including:

- child criminal exploitation (CCE);
- child sexual exploitation (CSE);
- county lines activity;
- domestic servitude;
- forced marriage;
- sexual abuse;
- missing children;
- organised crime;
- benefit fraud;
- coercive and controlling behaviour; and
- violence against women and girls (VAWG).

Children may be trafficked or exploited for a variety of purposes, including:

- sexual exploitation;
- criminal exploitation;
- domestic servitude;
- forced labour;
- cannabis cultivation;
- agricultural work;
- work within hospitality, catering, beauty or service industries;
- debt bondage;
- forced begging;
- benefit fraud;
- illegal adoption;
- sham marriage; and
- organ trafficking.

The school recognises that children may be exploited by strangers, organised criminal groups, family members, carers or individuals known to them. Children may not recognise that they are victims of exploitation and may believe that the individuals exploiting them are friends, partners, family members or people they trust.

Indicators of Modern Slavery and Human Trafficking

Staff should remain alert to indicators that may suggest a child is being trafficked or exploited. These may include:

- reluctance or fear when speaking to professionals;
- inconsistent, vague or rehearsed explanations;
- signs that another individual is controlling the child;
- reluctance to disclose personal information;
- missing episodes from home, care or education;
- repeated changes of school or address;
- unexplained travel;
- being found a considerable distance from home;
- living in overcrowded, poor or unsuitable accommodation;
- being unfamiliar with their local area;
- limited English language skills without a clear explanation;
- an unrelated child residing within a household;
- lack of identity documents or travel documentation;
- possession of false documentation;
- little knowledge of carers or accompanying adults;
- no evidence of parental responsibility arrangements;
- isolation from peers;
- excessive domestic responsibilities;
- evidence of inappropriate work activity;
- not having the freedom to come and go independently; and
- concern that the child is under the control or influence of another person.

Physical Indicators

Staff should be alert to:

- signs of physical abuse or assault;
- unexplained injuries;
- untreated medical conditions;
- poor hygiene;

- malnourishment;
- exhaustion or chronic tiredness;
- work-related injuries;
- evidence of neglect;
- inappropriate clothing for age or circumstances; and
- indications that the child is undertaking excessive physical labour.

Sexual Health Indicators

Indicators may include:

- sexualised behaviour;
- sexually transmitted infections;
- pregnancy;
- recurrent sexual health concerns;
- injuries of a sexual nature; or
- disclosures relating to sexual exploitation.

Emotional and Psychological Indicators

A child who is experiencing trafficking or modern slavery may present with:

- anxiety or persistent fear;
- withdrawal or isolation;
- depression;
- low self-esteem;
- self-harm;
- suicidal thoughts;
- emotional numbness;
- post-traumatic stress symptoms;
- aggression or hostility;
- concentration difficulties;
- memory difficulties;
- substance misuse; or
- feelings of shame, guilt or self-blame.

Children from Abroad

The school recognises that children arriving from abroad may have additional vulnerabilities and may require particular safeguarding consideration. Staff should not assume that a child is safe simply because they are accompanied by an adult. Professional curiosity should be exercised where living arrangements, care arrangements or travel circumstances are unclear.

Responding to Concerns

Any concerns relating to modern slavery, trafficking or exploitation must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

The DSL will:

- assess the level of risk and vulnerability;
- consider whether the child may be a victim of trafficking or exploitation;
- consult local safeguarding procedures;
- make referrals to Children's Social Care and the Police where appropriate;
- consider referral through the National Referral Mechanism (NRM) where relevant;

- work with safeguarding partners and specialist services;
- ensure appropriate support is provided to the child; and
- maintain clear safeguarding records of concerns, decisions and actions.

The school will work closely with Children's Social Care, the Police, Health Services, Family Help Services and other relevant agencies to safeguard children who may be victims of trafficking, modern slavery or exploitation.

Where concerns relating to modern slavery, trafficking or exploitation arise, the school will follow:

- Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures;
- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- the Modern Slavery Act 2015;
- National Referral Mechanism guidance; and
- relevant Home Office and Department for Education safeguarding guidance.

The welfare, safety and best interests of the child will always be the paramount consideration. Children who may be victims of trafficking, slavery or exploitation will be treated as victims of abuse and provided with appropriate safeguarding support and protection.

4.10 Child-on-Child Abuse

The Willows School recognises that children can abuse other children (child-on-child abuse) and that such abuse can occur both inside and outside school, online and offline. Child-on-child abuse is a safeguarding issue and will be taken seriously, investigated appropriately and managed in accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, local safeguarding partnership procedures and other relevant statutory guidance.

The school recognises that child-on-child abuse can have a significant impact on the health, wellbeing, safety and educational outcomes of those involved. All staff should understand that abuse is abuse and should never be tolerated, dismissed or minimised as:

- banter;
- part of growing up;
- having a laugh;
- harmless fun;
- horseplay;
- just boys being boys; or
- an inevitable part of childhood.

We recognise that failing to challenge inappropriate behaviours can create environments where abuse is normalised and where children may be placed at risk of harm. Even behaviours that appear minor may indicate underlying safeguarding concerns and should be addressed promptly and proportionately.

Any concerns regarding child-on-child abuse must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL and recorded in accordance with the school's safeguarding procedures.

Child-Centred Approach

The school recognises that every child involved in an incident of child-on-child abuse may need support. We will adopt a child-centred approach that:

- protects and supports the child who has experienced harm;
- considers the needs, safety and welfare of all children involved;
- recognises that a child who has harmed another child may themselves be vulnerable, exploited or experiencing abuse;
- avoids unnecessary criminalisation of children where appropriate;
- assesses risk on an individual basis; and
- promotes safety, recovery and positive outcomes for all pupils.

The term victim is used throughout this policy to reflect statutory guidance. However, the school recognises that not all children choose to identify in this way. Where appropriate, language such as *child who has experienced harm*, *child affected by abuse*, *child whose behaviour has caused concern*, *alleged perpetrator* or *child displaying harmful behaviour* may also be used.

Forms of Child-on-Child Abuse

Child-on-child abuse may take many forms and can include, but is not limited to:

- bullying, including cyberbullying;
- prejudice-based, discriminatory or hate-related bullying;
- racist, faith-based, homophobic, biphobic, transphobic, sexist or disability-related abuse;
- physical abuse, including hitting, kicking, punching, biting, hair-pulling, choking or other physical harm;
- emotional or psychological abuse;
- abuse within intimate personal relationships;
- coercive and controlling behaviour;
- sexual violence, including rape, assault by penetration and sexual assault;
- sexual harassment;
- harmful sexual behaviour;
- unwanted sexualised touching;
- sexual comments, taunting, jokes and remarks;
- online sexual harassment;
- sharing sexual images or messages;
- consensual and non-consensual sharing of nude and semi-nude images and videos;
- sexual exploitation;
- criminal exploitation;
- upskirting;
- initiation ceremonies, hazing, dares or humiliation rituals;

- technology-facilitated abuse, including abuse using social media, messaging platforms, gaming platforms and artificial intelligence (AI);
- blackmail, coercion or sexual extortion ("sextortion"); and
- stalking, intimidation or harassment.

Vulnerable Groups

The school recognises that some children may be particularly vulnerable to child-on-child abuse or may face additional barriers to reporting concerns, including:

- children with SEND;
- children with communication difficulties;
- children with mental health needs;
- children with social workers or previous social care involvement;
- looked after and previously looked after children;
- children living in kinship care arrangements;
- LGBTQ+ children;
- children experiencing discrimination or marginalisation; and
- children affected by trauma or adverse childhood experiences.

Staff will consider these vulnerabilities when assessing concerns and planning support.

Sexual Violence and Sexual Harassment

The school recognises that sexual violence and sexual harassment can occur between children of any age and gender and may occur in person, online or through a combination of both.

Staff should be aware that:

- sexual violence and sexual harassment are never acceptable;
- children may not always recognise harmful behaviour;
- reports may be made by victims, witnesses or third parties;
- some incidents may constitute criminal offences;
- children are entitled to be believed, supported and safeguarded; and
- a child's wishes should be considered alongside professional safeguarding responsibilities.

The school will respond to reports of sexual violence and sexual harassment in accordance with Part Five of KCSIE and local safeguarding procedures.

Responding to Concerns

When concerns about child-on-child abuse are raised, the DSL will:

- ensure immediate safety and welfare considerations are addressed;
- undertake an initial risk assessment;
- consider the wishes of the child who has experienced harm;
- consider the needs and circumstances of all children involved;

- determine whether Children's Social Care, the Police or other agencies should be involved;
- consider whether the behaviour indicates wider safeguarding concerns;
- record all concerns, discussions, decisions and actions;
- develop and implement support plans where appropriate;
- undertake ongoing risk assessment and monitoring; and
- ensure appropriate information sharing with relevant professionals.

Where appropriate, the school will utilise local exploitation, harmful sexual behaviour, child-on-child abuse and contextual safeguarding processes.

Prevention

The Willows School is committed to creating a culture where child-on-child abuse is not tolerated and where children feel safe to report concerns.

The school will seek to prevent child-on-child abuse through:

- creating and maintaining a safe, respectful and inclusive environment;
- promoting a culture of dignity, equality and respect;
- maintaining high expectations of behaviour;
- challenging inappropriate language and behaviour immediately;
- delivering effective Relationships, Sex and Health Education (RSHE), PSHE and online safety education;
- teaching pupils about healthy relationships, consent, boundaries and personal safety;
- educating pupils about reporting concerns and accessing support;
- implementing robust anti-bullying strategies;
- operating effective supervision arrangements;
- maintaining clear safeguarding procedures;
- providing regular safeguarding training for staff and volunteers;
- engaging with parents and carers to promote safeguarding awareness; and
- monitoring trends and patterns of behaviour to identify emerging risks.

Online Child-on-Child Abuse

The school recognises that technology plays a significant role in many incidents of child-on-child abuse.

Online abuse may include:

- cyberbullying;
- online sexual harassment;
- coerced sharing of images;
- non-consensual image sharing;
- sexual extortion;
- online grooming;

- threatening or abusive messages;
- humiliation through social media;
- AI-generated abuse and image manipulation; and
- the sharing of harmful content.

Staff will remain alert to emerging online harms and ensure that concerns are responded to promptly and appropriately.

Record Keeping and Multi-Agency Working

All child-on-child abuse concerns, disclosures, allegations, decisions, actions and outcomes will be recorded on the school's safeguarding recording system. The DSL will ensure that accurate chronologies are maintained and that concerns are reviewed to identify patterns, repeat incidents or escalating risks.

Where required, the school will work closely with:

- Children's Social Care;
- Family Help services;
- the Police;
- Health Services;
- CAMHS and Mental Health Support Teams;
- Youth Justice Services;
- safeguarding partners; and
- specialist exploitation and abuse services.

Where concerns relate to Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines activity, trafficking, harmful sexual behaviour, sexual violence or serious violence, the DSL will follow Lancashire Children's Safeguarding Assurance Partnership procedures and relevant referral pathways.

Young people, families and professionals may also access advice and support from specialist organisations, including Shore Space (<https://shorespace.org.uk>), which provides support regarding harmful sexual thoughts and behaviours.

The welfare of the child remains paramount. All concerns relating to child-on-child abuse will be responded to promptly, proportionately and in a manner that safeguards, supports and protects all children involved.

4.11 Sexual Violence and Sexual Harassment Between Children

The Willows School recognises that sexual violence and sexual harassment can occur between children of any age and gender, both inside and outside school, online and offline. Sexual violence and sexual harassment can occur between individuals or groups of children and may occur within friendship groups, peer groups or intimate personal relationships. These behaviours exist on a continuum and may overlap. The school adopts a zero-tolerance approach to all forms of sexual violence, sexual harassment and harmful sexual behaviour. In accordance with Keeping Children Safe in Education (KCSIE) 2026, all reports will be taken seriously and responded to promptly, effectively and in a child-centred manner.

We recognise that sexual violence and sexual harassment are never acceptable and will never be tolerated. They are not:

- banter;
- part of growing up;
- harmless fun;
- a joke;
- relationship drama;
- an inevitable part of childhood; or
- "just boys being boys".

Failure to challenge these behaviours can contribute to an unsafe culture in which abuse is normalised and children feel unable to report concerns. All staff are expected to challenge inappropriate behaviours and language at the earliest opportunity.

Our Approach

At The Willows School:

- every report of sexual violence or sexual harassment will be taken seriously;
- all children involved will be treated with dignity, fairness and respect;
- the wishes, feelings and lived experiences of the child who has experienced harm will be carefully considered;
- the safety and welfare of children will be the paramount consideration;
- appropriate support will be provided to all children involved;
- safeguarding action will be proportionate, trauma-informed and child-centred;
- all decisions will be informed by risk assessment and professional judgement; and
- concerns will be managed in accordance with statutory guidance and local safeguarding procedures.

The school recognises that children who have experienced sexual violence or sexual harassment may experience significant emotional distress, trauma, anxiety, fear, shame, self-blame and educational disruption. Appropriate support will be offered regardless of whether a formal complaint, criminal investigation or social care intervention follows.

Staff Responsibilities

All staff will:

- maintain an attitude that "it could happen here";
- understand that sexual violence and sexual harassment are safeguarding concerns;
- recognise indicators of sexual abuse and harmful sexual behaviour;
- report concerns immediately to the Designated Safeguarding Lead (DSL);
- avoid minimising, dismissing or trivialising concerns;
- follow the school's disclosure and reporting procedures;
- maintain professional curiosity; and
- challenge sexist, misogynistic, prejudicial or harmful attitudes and behaviours.

Staff should be aware that sexual violence and sexual harassment may be influenced by wider societal factors, including:

- sexist stereotypes;
- misogyny;
- discriminatory attitudes;
- exposure to harmful online content;
- pornography;
- peer group influences;
- coercive behaviour;
- online influencers and platforms;

- technology-facilitated abuse; and
- violence against women and girls (VAWG).

Sexual Violence

In accordance with the Sexual Offences Act 2003, sexual violence includes:

Rape

Rape occurs where a person intentionally penetrates the vagina, anus or mouth of another person with their penis, without consent and without a reasonable belief that consent has been given.

Assault by Penetration

Assault by penetration occurs where a person intentionally penetrates the vagina or anus of another person with a part of their body or an object, the act is sexual, and consent is absent.

Sexual Assault

Sexual assault occurs where a person intentionally touches another person in a sexual manner without consent.

Causing a Person to Engage in Sexual Activity Without Consent

This includes causing or coercing another person to take part in sexual activity without their consent, whether with the perpetrator, themselves or a third party.

Consent

Consent means agreeing by choice and having both the freedom and capacity to make that choice.

Staff should understand that:

- consent can be withdrawn at any time;
- consent must be ongoing;
- consent to one activity does not imply consent to another;
- a child under the age of 13 cannot legally consent to any form of sexual activity;
- the age of consent in England is 16; and
- sexual activity without consent may constitute a criminal offence.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that:

- violates a child's dignity;
- causes intimidation, humiliation or degradation; or
- creates a hostile, offensive, sexualised or unsafe environment.

Sexual harassment can occur in person, online or through a combination of both.

Examples of Sexual Harassment

This may include:

- sexual comments or remarks;

- sexual jokes;
- sexual name-calling;
- unwanted comments about appearance;
- rumours of a sexual nature;
- unwanted touching;
- deliberately brushing against another person;
- displaying sexual images;
- inappropriate gestures;
- intimidation of a sexual nature;
- sexualised bullying; and
- online sexual harassment.

Online Sexual Harassment and Technology-Facilitated Abuse

The school recognises the increasing role of technology in facilitating sexual abuse between children.

Online sexual harassment may include:

- unwanted sexual messages;
- sharing sexual content;
- pressure to send images;
- sexual coercion or blackmail;
- sexualised cyberbullying;
- sharing of nude or semi-nude images;
- online grooming;
- sexual exploitation;
- sexual extortion ("sextortion");
- misuse of livestreaming platforms;
- image-based abuse;
- AI-generated sexual images ("deepfakes");
- digitally manipulated sexual images; and
- distribution of harmful content across multiple platforms.

The misuse of artificial intelligence and image manipulation technology to create, alter or distribute sexualised images of children without consent will be treated as a serious safeguarding concern.

Nude and Semi-Nude Images

The consensual and non-consensual sharing of nude and semi-nude images or videos between children will be managed in accordance with:

- KCSIE 2026;
- UKCIS guidance *Sharing Nudes and Semi-Nudes: Advice for Education Settings*;
- safeguarding procedures; and
- local partnership guidance.

Children should never be blamed for creating or sharing an image of themselves where they have been coerced, manipulated or exploited.

Upskirting

Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019.

Upskirting occurs when someone takes a photograph or recording beneath another person's clothing without their knowledge or consent with the intention of:

- obtaining sexual gratification; or
- causing humiliation, distress or alarm.

Any allegation of upskirting will be treated as a safeguarding concern and may require Police involvement.

Harmful Sexual Behaviour (HSB)

The school recognises that children's sexual behaviour exists on a continuum from:

- developmentally expected behaviour;
- inappropriate behaviour;
- problematic behaviour;
- harmful sexual behaviour; through to
- abusive and violent sexual behaviour.

When assessing behaviour, the DSL will consider:

- age;
- developmental stage;
- understanding;
- consent;
- context;
- power imbalance;
- coercion;
- frequency; and
- impact on others.

A younger child may abuse an older child where there is a power imbalance, vulnerability or coercive dynamic.

Responding to Reports

The initial response to a disclosure is critically important.

When a report is made staff will:

- listen carefully and calmly;
- reassure the child;
- believe the child;
- avoid asking leading questions;
- explain that information cannot be kept secret;
- report immediately to the DSL; and
- record the concern accurately using the child's own words where possible.

The school recognises that reports may come from:

- the child who experienced harm;
- friends or peers;
- parents/carers;
- staff observations;
- online monitoring;
- third-party agencies; or
- behavioural indicators.

DSL Considerations

When managing an incident, the DSL will consider:

- the wishes and feelings of the child who has experienced harm;
- immediate and ongoing safety;
- whether a criminal offence may have occurred;
- the nature and seriousness of the incident;
- ages and developmental stages;
- power imbalances;
- SEND and communication needs;
- intimate personal relationships;
- contextual safeguarding risks;
- risks to other children;
- patterns of behaviour;
- harmful sexual behaviour indicators;
- wider family circumstances;
- online elements;
- support needs of all children involved; and
- whether external agencies should be involved.

Possible DSL Actions

Depending on the circumstances, the DSL may:

- undertake an immediate safeguarding risk assessment;
- develop a safety and support plan;
- implement a Harmful Sexual Behaviour Risk Management Plan;
- refer to Children's Social Care;
- refer to the Police;
- seek Family Help involvement;
- obtain specialist harmful sexual behaviour advice;
- arrange pastoral or therapeutic support;
- involve health services or CAMHS;
- work with parents/carers where appropriate;
- implement behavioural sanctions in line with school policy; and
- coordinate a multi-agency safeguarding response.

Supporting Children

The school will ensure that:

- children who have experienced harm receive ongoing support;
- children whose behaviour has caused concern receive appropriate intervention;
- educational disruption is minimised where possible;
- risk is regularly reviewed;
- support plans remain dynamic and responsive; and
- all children involved are treated fairly, proportionately and sensitively.

Record Keeping

All concerns, allegations, disclosures, decisions, assessments, referrals and actions relating to sexual violence, sexual harassment and harmful sexual behaviour will be:

- recorded promptly;

- stored securely;
- reviewed by safeguarding leaders;
- monitored for patterns and trends; and
- retained in accordance with data protection and safeguarding requirements.

Where concerns arise, The Willows School will follow:

- Keeping Children Safe in Education (2026) Part Five
- Working Together to Safeguard Children (2026)
- Lancashire Children's Safeguarding Assurance Partnership procedures
- UKCIS guidance on sharing nudes and semi-nudes
- Relevant Police, Children's Social Care and safeguarding partner procedures.

The welfare, safety and best interests of the child who has experienced harm will always remain the paramount consideration.

4.12 Children requiring mental health support Inc. self-harm and suicidal ideation

The Willows School recognises that positive mental health and emotional wellbeing are fundamental to children's safety, development, learning and overall welfare. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, and the Department for Education's Mental Health and Behaviour in Schools guidance, the school adopts a whole-school approach to promoting mental health, resilience and emotional wellbeing. Mental health concerns will be viewed through both a welfare and safeguarding lens, recognising that in some cases they may be indicators that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other adverse experiences.

The school recognises that only appropriately trained professionals should make diagnoses of mental health conditions. However, all staff are well placed to observe children on a daily basis and may identify changes in behaviour, presentation, attendance, emotional wellbeing or functioning that indicate a child requires additional support.

Whole School Approach to Mental Health and Wellbeing

The Willows School is committed to promoting a culture in which children feel safe, valued, respected and able to access support when required.

Our whole-school approach includes:

- promoting positive mental health, resilience and emotional wellbeing across the curriculum;
- fostering a safe, inclusive and nurturing environment;
- creating a culture where seeking help is encouraged and normalised;
- supporting positive relationships and belonging;
- recognising and responding to emerging concerns at the earliest opportunity;
- providing access to pastoral, therapeutic and mental health support;
- working collaboratively with parents/carers and external agencies; and
- ensuring staff receive appropriate training and supervision in relation to emotional wellbeing and mental health.

The school has access to a Mental Health Practitioner and other appropriate support services. Pupils may access support through established referral pathways, pastoral arrangements and safeguarding procedures.

The school's approach extends beyond classroom teaching and includes:

Culture, Ethos and Environment

The health, wellbeing and emotional welfare of pupils and staff are promoted through:

- leadership and management practices;
- school values and ethos;
- behaviour and safeguarding policies;
- anti-bullying and inclusion strategies;
- the physical and social environment;
- pupil voice opportunities; and
- positive relationships throughout the school community.

Teaching and Learning

Through PSHE, RSHE, wellbeing education and wider curriculum opportunities, the school supports pupils to develop:

- emotional literacy;
- resilience and coping strategies;
- healthy relationship skills;
- self-awareness;
- online safety awareness;
- help-seeking behaviours; and
- understanding of mental health and wellbeing.

Family and Community Partnerships

The school works proactively with:

- parents and carers;
- health services;
- Mental Health Support Teams;
- CAMHS;
- Children's Social Care;
- Family Help services;
- educational psychologists;
- voluntary sector organisations; and
- safeguarding partners

to ensure coordinated support for children and families where required.

Mental Health and Safeguarding

Staff should understand that mental health concerns may be:

- a response to trauma, abuse, neglect or exploitation;
- an indicator that a child may require additional safeguarding support;
- linked to attendance difficulties, behavioural concerns or emotional distress; and
- associated with other vulnerabilities including SEND, adverse childhood experiences and family difficulties.

Where staff have concerns about a child's mental health that also give rise to a safeguarding concern, they must:

- immediately report the matter to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- record the concern promptly on the school's safeguarding recording system;
- follow safeguarding procedures; and
- continue to monitor and support the child appropriately.

Where concerns relate solely to emotional wellbeing or mental health and there is no safeguarding concern, staff should seek advice from the school's Mental Health Practitioner, pastoral team or other appropriate professionals.

Self-Harm

The school recognises that self-harm is a significant indicator of emotional distress and may be associated with underlying mental health needs, trauma, abuse, neglect, exploitation or other vulnerabilities.

Self-harm may include:

- cutting;
- scratching;
- burning;
- scalding;
- biting;
- hair pulling;
- self-poisoning;
- hitting or punching oneself;
- deliberate injury; or
- other behaviours intended to cause physical harm.

Staff should be aware that self-harm can occur regardless of age, gender or background and that some children may conceal their injuries or behaviours.

Responding to Concerns About Self-Harm

Where staff become aware that a child is self-harming or may be self-harming, they must:

- report concerns immediately to the DSL or Deputy DSL;
- seek immediate medical assistance where required;
- maintain a calm, supportive and non-judgemental approach;
- avoid making assumptions about motivation;
- record concerns accurately and factually; and
- follow safeguarding procedures.

The DSL will consider:

- immediate safety;
- the level of risk;
- any existing safety plans or support plans;
- consultation with parents/carers where appropriate;
- involvement of health professionals;
- referral to CAMHS or other mental health services;
- Family Help or Children's Social Care involvement where necessary; and
- the need for a specific risk assessment or safety plan.

Reasonable measures may be implemented to reduce risk and support wellbeing, including increased supervision, therapeutic support, pastoral intervention, environmental adaptations and collaborative safety planning.

Suicidal Ideation and Suicide Risk

Any expression of suicidal thoughts, plans, intent or behaviours must always be taken seriously and treated as a potential safeguarding concern.

This may include:

- verbal statements about wanting to die;
- expressions of hopelessness;
- discussions about suicide;
- suicide plans;
- preparatory behaviours;
- suicide attempts; or
- information received from peers, parents or professionals.

No disclosure or indication of suicidal intent should ever be dismissed as attention-seeking or low risk.

Responding to Suicidal Ideation

Where there are concerns that a child is expressing suicidal thoughts, plans or intent, staff must:

- remain with the child where immediate risk is identified;
- seek urgent support from the DSL or Deputy DSL;
- obtain emergency assistance if there is an immediate threat to life;
- record concerns immediately;
- follow safeguarding procedures; and
- ensure appropriate supervision until a risk assessment has been completed.

The DSL will:

- undertake or coordinate an immediate risk assessment;
- consider the need for emergency intervention;
- liaise with parents/carers where appropriate;
- seek advice from CAMHS, Mental Health Services, GPs or other clinicians;
- make referrals to Children's Social Care where safeguarding thresholds are met;
- coordinate a multi-agency response where required;
- develop an appropriate safety plan; and
- ensure ongoing review of risk.

Where there is an immediate danger to life or serious concern for a child's safety, emergency services will be contacted without delay.

Risk Assessment and Multi-Agency Working

Where concerns regarding self-harm or suicidal ideation are identified, the school will work collaboratively with:

- parents/carers;
- CAMHS;
- Mental Health Support Teams;
- GPs and health professionals;
- Children's Social Care;
- Family Help services;
- safeguarding partners; and
- other relevant agencies.

The DSL will ensure that risk assessments, support plans and safeguarding records are reviewed regularly and updated in response to changing circumstances.

Record Keeping

All concerns relating to mental health, self-harm, suicidal ideation, risk assessments, referrals, discussions and interventions must be:

- recorded promptly and accurately;
- stored securely within the safeguarding recording system;
- reviewed by safeguarding leaders;
- shared appropriately on a need-to-know basis; and
- retained in accordance with safeguarding and data protection requirements.

Local Procedures

Where concerns relate to self-harm, suicidal ideation or suicide risk, The Willows School will follow:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Mental Health and Behaviour in Schools (DfE)
- Lancashire Children's Safeguarding Assurance Partnership procedures
- Local protocols relating to self-harm, suicide prevention and emotional wellbeing.

The welfare, safety and best interests of the child will remain paramount. Any concerns regarding self-harm, suicidal ideation or serious mental health difficulties will be treated seriously, responded to promptly and managed through a coordinated, child-centred approach.

4.13 Bullying including online Bullying (cyberbullying)

The Willows School recognises that bullying, including cyberbullying and prejudice-based bullying, can have a significant impact on a child's emotional wellbeing, mental health, safety, attendance, engagement with education and overall welfare. Whilst bullying is not a separate category of abuse under safeguarding legislation, it can cause considerable harm and, in some cases, may be linked to abuse, neglect, exploitation, child-on-child abuse or other safeguarding concerns.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the Equality Act 2010 and local safeguarding partnership procedures, all allegations, incidents and concerns relating to bullying will be taken seriously, recorded appropriately and responded to promptly.

The school adopts a zero-tolerance approach to bullying and is committed to creating a safe, respectful, inclusive and supportive environment where all children feel valued, protected and able to learn.

Definition of Bullying

Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group physically or emotionally.

Bullying can take many forms and may occur:

- face-to-face;
- online;
- directly or indirectly;

- individually or in groups;
- within school;
- outside school; or
- through a combination of online and offline behaviours.

Types of Bullying

Bullying may include, but is not limited to:

- physical bullying;
- verbal bullying;
- emotional or psychological bullying;
- social exclusion or relational bullying;
- discriminatory or prejudice-based bullying;
- racist bullying;
- homophobic, biphobic or transphobic bullying;
- disability-related bullying;
- faith-based bullying;
- sexist or misogynistic bullying;
- bullying related to special educational needs and disabilities (SEND); and
- cyberbullying.

The school recognises that prejudice-based bullying and discriminatory behaviours may also constitute child-on-child abuse and safeguarding concerns.

Cyberbullying

Cyberbullying is the use of technology to deliberately harass, threaten, intimidate, humiliate, control or target another individual.

Cyberbullying may occur through:

- mobile phones;
- text messages;
- social media platforms;
- instant messaging applications;
- online gaming platforms;
- livestreaming platforms;
- websites and forums;
- email; or
- emerging technologies, including artificial intelligence (AI).

The school recognises that increasing access to technology and social media means that cyberbullying can occur at any time, may reach a large audience rapidly and can have a significant and lasting impact on children.

Examples of Cyberbullying

Examples may include:

- sending abusive, threatening or intimidating messages;
- encouraging a child to self-harm, attempt suicide or engage in risky behaviour;
- creating fake or impersonation accounts;
- trolling or deliberately posting upsetting content;
- hacking accounts to embarrass, manipulate or harm another person;

- sharing rumours or false information;
- encouraging participation in abusive polls or online campaigns;
- exclusion from online groups or activities;
- racist, sexist, homophobic, biphobic, transphobic or discriminatory behaviour;
- establishing hate groups, pages or websites targeting an individual;
- sharing, threatening to share or manipulating images without consent;
- consensual or non-consensual sharing of nude or semi-nude images;
- sexual harassment or online sexual abuse;
- AI-generated image abuse, including deepfakes and manipulated images;
- sexual extortion ("sextortion");
- doxxing (sharing personal information online); and
- coordinated online harassment across multiple platforms.

Vulnerable Children

The school recognises that some children may be more vulnerable to bullying and cyberbullying, including:

- children with SEND;
- looked after and previously looked after children;
- children with social workers;
- children experiencing mental health difficulties;
- LGBTQ+ children;
- children from minority ethnic communities;
- children experiencing discrimination; and
- children with communication difficulties or additional vulnerabilities.

Staff will remain alert to the additional barriers these children may face when reporting concerns.

Indicators of Bullying

Signs that a child may be experiencing bullying can include:

- reluctance to attend school;
- increased absence or persistent lateness;
- decline in academic performance;
- anxiety or emotional distress;
- social withdrawal or isolation;
- loss of confidence;
- changes in friendships;
- unexplained injuries;
- damaged or missing belongings;
- self-harm;
- changes in eating or sleeping patterns;
- low mood or depression;
- suicidal thoughts or behaviours; and
- increased use of or avoidance of technology.

Responding to Concerns

All incidents or concerns relating to bullying or cyberbullying must be reported and addressed promptly.

Where bullying raises safeguarding concerns, staff must:

- report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- record the concern on the school's safeguarding recording system;

- consider whether the behaviour meets the threshold for child-on-child abuse;
- assess the impact on the child experiencing harm;
- ensure appropriate support is provided;
- work with parents/carers where appropriate;
- consider any wider safeguarding concerns; and
- involve external agencies where required.

The school recognises that bullying may be associated with:

- child-on-child abuse;
- harmful sexual behaviour;
- sexual harassment;
- discrimination;
- exploitation;
- online abuse;
- mental health concerns; or
- suicide and self-harm risks.

Where these concerns are identified, safeguarding procedures will take precedence.

Prevention

The Willows School seeks to prevent bullying through:

- a positive and inclusive school culture;
- effective behaviour management;
- strong relationships between staff and pupils;
- anti-bullying education;
- RSHE and PSHE programmes;
- online safety education;
- promoting respect, equality and diversity;
- challenging discriminatory language and behaviour;
- pupil voice activities;
- safeguarding assemblies and awareness campaigns;
- staff training; and
- partnership working with families and external agencies.

All staff will actively challenge inappropriate language, discriminatory behaviour, bullying, harassment and abuse at the earliest opportunity.

Record Keeping and Monitoring

All bullying incidents will be recorded, monitored and reviewed in accordance with the school's:

- Safeguarding and Child Protection Policy;
- Child-on-Child Abuse Policy;
- Anti-Bullying Policy;
- Behaviour Policy; and
- Online Safety Policy.

The DSL will review incidents to identify patterns, trends and emerging risks and ensure that appropriate support and interventions are implemented.

Local Procedures

Where bullying, cyberbullying or prejudice-based bullying gives rise to safeguarding concerns, the school will follow:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures
- Local child-on-child abuse procedures
- Relevant online safety and exploitation guidance.

The welfare, safety and wellbeing of the child will always be the paramount consideration. All children have the right to learn in an environment that is safe, respectful and free from bullying, harassment and discrimination.

4.14 Children Who Are Lesbian, Gay, Bisexual, Transgender, Questioning or Gender Questioning (LGBTQ+)

The Willows School recognises that a child being lesbian, gay, bisexual, transgender, questioning or gender questioning does not in itself constitute a safeguarding concern and is not an inherent risk factor for harm. However, some children who are LGBTQ+ may experience additional vulnerabilities, including bullying, prejudice, discrimination, isolation, harassment, abuse or poor mental health outcomes, and these factors may increase safeguarding risks. In accordance with Keeping Children Safe in Education (KCSIE) 2026, staff should be aware that children who are LGBTQ+ can be targeted by other children and adults and may require additional support to feel safe, included and able to access help when needed.

The school recognises that children who are perceived by others to be LGBTQ+, whether they identify in this way or not, may experience the same risks and vulnerabilities as those who openly identify as LGBTQ+.

Safeguarding Considerations

Staff should be aware that LGBTQ+ children may be more vulnerable to:

- bullying, including cyberbullying;
- prejudice-based or discriminatory abuse;
- homophobic, biphobic or transphobic language, harassment or violence;
- child-on-child abuse;
- social isolation and exclusion;
- emotional wellbeing and mental health difficulties;
- self-harm or suicidal ideation;
- online abuse or exploitation;
- family rejection or relationship difficulties; and
- barriers to seeking help or reporting concerns.

The school recognises that these risks arise from the behaviours, attitudes or actions of others and not from a child's sexual orientation, gender identity or gender questioning.

Creating a Safe and Inclusive Environment

The Willows School is committed to creating a culture where all children are treated with dignity, respect and fairness and where diversity is valued.

The school will:

- promote equality, inclusion and respect for all pupils;
- challenge discriminatory language, attitudes and behaviours promptly;
- ensure that bullying, harassment and prejudice-based incidents are taken seriously and addressed appropriately;
- foster an environment where children feel safe to express concerns;
- provide age-appropriate education about respect, relationships, equality and diversity through the curriculum;
- promote positive mental health and wellbeing;
- ensure staff understand safeguarding issues that may affect LGBTQ+ children; and
- maintain a culture where children know how to access support.

Trusted Adults and Support

The school recognises that safeguarding risks can be increased where a child does not have a trusted adult with whom they feel able to speak openly.

Staff will therefore endeavour to:

- provide safe opportunities for children to share worries or concerns;
- listen carefully and non-judgementally;
- take concerns seriously;
- respond sensitively and appropriately;
- respect confidentiality whilst fulfilling safeguarding duties;
- ensure that children know who they can approach for support; and
- work in the child's best interests at all times.

Mental Health and Wellbeing

The school recognises that some LGBTQ+ children may experience increased levels of anxiety, emotional distress, low self-esteem, self-harm or mental health difficulties as a result of bullying, discrimination, social pressures or other experiences.

Where concerns arise regarding a child's wellbeing or safety, staff will follow the school's safeguarding and mental health procedures and seek appropriate support and intervention.

Responding to Concerns

Any concerns relating to bullying, harassment, discrimination, abuse, exploitation, self-harm, suicidal ideation or other safeguarding issues affecting an LGBTQ+ child must be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL and managed in accordance with safeguarding procedures.

The school will:

- consider the individual circumstances and wishes of the child;
- undertake appropriate risk assessments where necessary;
- provide support and safeguarding interventions;
- work with parents/carers where appropriate and in the child's best interests;
- involve external agencies where required; and
- record concerns, decisions and actions on the school's safeguarding recording system.

Equality and Safeguarding

The Willows School is committed to meeting its responsibilities under:

- Keeping Children Safe in Education (2026);
- Working Together to Safeguard Children (2026);
- The Equality Act 2010;
- The Human Rights Act 1998;
- local safeguarding partnership procedures; and
- the school's Equality, Behaviour, Anti-Bullying, Safeguarding and Child Protection Policies.

All children, regardless of sexual orientation, gender identity, gender questioning status or perceived identity, have the right to feel safe, respected, included and protected from harm. The welfare and best interests of the child will always remain the paramount consideration.

4.15 Domestic Abuse

The Willows School recognises that domestic abuse is a significant safeguarding issue that can have a profound and lasting impact on children, whether they experience it directly, witness it, hear it, or live in an environment where abuse occurs. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, and the Domestic Abuse Act 2021, all staff should understand the impact domestic abuse can have on a child's safety, welfare, emotional wellbeing, development and ability to learn.

Definition of Domestic Abuse

The Domestic Abuse Act 2021 defines domestic abuse as behaviour by a person ("A") towards another person ("B"), where:

- both A and B are aged 16 or over;
- A and B are personally connected; and
- the behaviour is abusive.

Behaviour is abusive if it consists of any of the following:

- physical abuse;
- sexual abuse;
- violent or threatening behaviour;
- controlling behaviour;
- coercive behaviour;
- economic abuse;
- psychological abuse;
- emotional abuse; or
- other forms of abuse.

Domestic abuse can consist of a single incident or a pattern of incidents and may occur in person, online or through a combination of both.

Personally Connected

Two people are considered personally connected if they:

- are, or have been, married;
- are, or have been, civil partners;
- have agreed to marry one another;
- have entered into a civil partnership agreement;
- are, or have been, in an intimate personal relationship;

- share parental responsibility for the same child; or
- are relatives.

Controlling Behaviour

Controlling behaviour is a range of acts designed to make someone subordinate and/or dependent by:

- isolating them from sources of support;
- exploiting their resources and capacities;
- depriving them of independence;
- restricting their freedom;
- limiting their ability to seek help; and
- regulating their everyday behaviour.

Coercive Behaviour

Coercive behaviour is a pattern of assault, threats, humiliation, intimidation or other abusive behaviour that is used to harm, punish, control or frighten another person.

Economic Abuse

Economic abuse includes behaviour that adversely affects a person's ability to:

- acquire money or property;
- use money or property;
- maintain financial independence; or
- obtain goods and services.

Impact on Children

The Willows School recognises that children are victims of domestic abuse in their own right.

Children may:

- witness incidents of abuse;
- hear abuse occurring;
- experience the aftermath of abuse;
- be used as part of abusive behaviour;
- experience coercive control within the household;
- experience abuse within their own intimate relationships (teenage relationship abuse); or
- suffer direct physical, emotional or psychological harm.

Exposure to domestic abuse can have serious and long-term effects on children, including:

- anxiety and emotional distress;
- depression;
- trauma;
- low self-esteem;
- behavioural difficulties;
- sleep difficulties;
- self-harm;
- suicidal ideation;
- difficulties forming healthy relationships;
- poor attendance;
- reduced educational attainment;

- mental health difficulties; and
- increased vulnerability to abuse and exploitation.

The school recognises that children do not need to witness abuse directly to be harmed by it. Living in a household where domestic abuse occurs can itself constitute emotional abuse and may meet safeguarding thresholds for intervention.

Teenage Relationship Abuse

The school recognises that domestic abuse can also occur within young people's own intimate relationships.

Teenage relationship abuse can include:

- controlling behaviour;
- coercive behaviour;
- emotional manipulation;
- intimidation;
- physical violence;
- sexual violence;
- online abuse;
- image-based abuse;
- sexual coercion;
- tracking or monitoring through technology; and
- threats or blackmail.

The curriculum will support pupils to recognise healthy and unhealthy relationships, consent, respect, personal boundaries and how to seek help.

Indicators of Domestic Abuse Affecting Children

Staff should be alert to indicators that a child may be affected by domestic abuse, including:

- anxiety, fearfulness or hypervigilance;
- sudden changes in behaviour;
- aggression or emotional dysregulation;
- withdrawal or isolation;
- poor attendance or lateness;
- reduced concentration;
- unexplained injuries;
- sleep difficulties;
- low mood or depression;
- self-harm;
- suicidal thoughts;
- frequent concern for a parent or sibling;
- reluctance to return home;
- disclosures made directly or indirectly; and
- significant changes in emotional wellbeing or presentation.

Responding to Concerns

Any concerns relating to domestic abuse must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

The DSL will:

- assess risk and need;
- consider the impact on the child;
- liaise with Children's Social Care where appropriate;
- seek advice from relevant agencies;
- make referrals where required;
- ensure appropriate support is provided for the child;
- consider the need for a Child in Need or Child Protection response;
- ensure concerns are accurately recorded; and
- review risk on an ongoing basis.

Where immediate danger exists, emergency services will be contacted without delay.

Operation Encompass

The Willows School participates in and supports Operation Encompass, a national initiative that enables schools and education settings to receive timely information from Police regarding domestic abuse incidents where a child may have been present, affected or impacted.

Operation Encompass allows the school to:

- provide immediate support to children affected by domestic abuse;
- understand potential changes in presentation or behaviour;
- implement appropriate safeguarding measures; and
- respond sensitively to children and families following incidents.

Staff may also access advice and guidance through the Operation Encompass Professional Advice Line.

Multi-Agency Working

The school recognises that effective support for children affected by domestic abuse requires coordinated multi-agency working.

Where appropriate, the school will work with:

- Children's Social Care;
- Family Help Services;
- Police;
- Health Services;
- CAMHS;
- Domestic Abuse Services;
- Operation Encompass;
- Safeguarding Partners; and
- other relevant agencies.

Support for Children

Support may include:

- pastoral support;
- therapeutic interventions;
- emotional wellbeing support;
- safety planning;
- mentoring;

- Family Help involvement;
- Child in Need support;
- Child Protection planning; and
- specialist domestic abuse services.

Record Keeping

All concerns, disclosures, discussions, referrals, decisions and actions relating to domestic abuse will be:

- recorded promptly;
- stored securely on the safeguarding recording system;
- shared on a need-to-know basis;
- reviewed regularly; and
- maintained in accordance with safeguarding and data protection requirements.

Further Guidance

Where concerns relate to domestic abuse, the school will follow:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- The Domestic Abuse Act 2021
- Lancashire Children's Safeguarding Assurance Partnership procedures
- Operation Encompass guidance
- Relevant national domestic abuse guidance and support pathways.

The welfare, safety and best interests of the child will always be the paramount consideration. Children affected by domestic abuse will be treated as victims in their own right and will receive appropriate safeguarding support, protection and intervention.

4.16 Radicalisation and Extremism

The Willows School recognises that safeguarding children against radicalisation and extremism is part of its wider safeguarding responsibilities. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the Counter-Terrorism and Security Act 2015 and the Prevent Duty Guidance, protecting children from the risk of radicalisation forms part of the school's duty to safeguard and promote the welfare of children.

Definitions

Radicalisation refers to the process by which an individual comes to support terrorism, violent extremism or extremist ideologies associated with terrorist groups.

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

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve those outcomes.

Terrorism is defined within terrorism legislation and includes actions or threats designed to influence governments or intimidate the public for the purpose of advancing a political, religious, racial or ideological cause.

The Prevent Duty

Prevent forms part of the Government's wider counter-terrorism strategy, CONTEST, and focuses on safeguarding people who may be vulnerable to radicalisation.

The school recognises that Prevent is a safeguarding responsibility and should not be viewed as a separate process. Safeguarding responses to radicalisation concerns will be managed in the same way as other safeguarding concerns, through assessment of risk, information sharing, multi-agency working and appropriate intervention.

The school will ensure that:

- safeguarding policies and procedures reflect Prevent responsibilities;
- staff receive appropriate Prevent awareness training;
- children are taught how to keep themselves safe, including online;
- pupils are supported to develop resilience to extremist narratives;
- concerns are referred appropriately through safeguarding channels;
- appropriate filtering and monitoring systems are in place;
- external speakers and visitors are appropriately risk assessed;
- British Values are actively promoted; and
- safeguarding leaders maintain oversight of Prevent-related concerns.

Understanding Vulnerability to Radicalisation

The school recognises that there is no single profile of a child who may become vulnerable to radicalisation and there is no definitive indicator that radicalisation is taking place.

Vulnerability may arise through a combination of factors, including:

- social isolation;
- experiences of discrimination or prejudice;
- family influences;
- exposure to extremist ideology;
- online activity;
- mental health difficulties;
- personal grievances;
- trauma or adverse childhood experiences;
- identity concerns;
- peer influences;
- criminal exploitation; or
- a desire for belonging, status or purpose.

Children may be exposed to extremist content through:

- social media;
- online forums;
- gaming platforms;
- encrypted messaging services;
- peer networks;
- family members;
- community influences; or

- extremist organisations.

Online Radicalisation

The Willows School recognises that the internet and digital technologies play a significant role in many radicalisation pathways.

Online risks may include:

- accessing extremist websites;
- viewing extremist propaganda;
- engagement with extremist groups online;
- exposure to misinformation and disinformation;
- online grooming by extremist individuals or groups;
- participation in extremist forums or chat rooms;
- algorithm-driven exposure to harmful content;
- AI-generated extremist content; and
- encouragement to commit acts of violence or hatred.

Staff will remain alert to emerging online risks and utilise the school's filtering, monitoring and online safety arrangements to support safeguarding.

Possible Indicators of Radicalisation

Staff should exercise professional curiosity and be alert to concerning changes in a child's behaviour, presentation or beliefs. Indicators may include:

- sudden changes in attitudes, behaviour or friendships;
- increased isolation from friends, family or school;
- expressing intolerance towards others;
- fixation on extremist ideologies, grievances or causes;
- use of extremist language, narratives or symbols;
- accessing extremist material online;
- justification of violence to achieve particular aims;
- significant changes in online behaviour;
- secretive use of technology;
- expressing support for extremist groups or acts of terrorism;
- repeated exposure to hateful or divisive content;
- becoming increasingly closed to alternative viewpoints;
- changes in appearance associated with extremist groups; and
- concerning comments regarding race, religion, gender, sexuality or democratic values.

These indicators do not necessarily mean that a child is being radicalised. However, they should be considered alongside the wider context and discussed with the Designated Safeguarding Lead (DSL).

Staff Responsibilities

All staff are responsible for:

- maintaining an attitude that "it could happen here";
- understanding the indicators of vulnerability to radicalisation;
- challenging extremist language or behaviour appropriately;
- promoting inclusion, equality and respect;
- reporting concerns immediately to the DSL or Deputy DSL;
- recording concerns promptly; and

- contributing to a safeguarding culture that protects children from harm.

DSL Responsibilities

Where concerns arise, the DSL will:

- assess the information available;
- consider the child's vulnerabilities, protective factors and circumstances;
- seek advice where necessary;
- liaise with other agencies as appropriate;
- make referrals through local safeguarding processes where required;
- consider whether a referral to Channel is appropriate;
- ensure concerns are accurately recorded; and
- monitor and review ongoing risks.

Channel Programme

The Channel Programme is a voluntary, confidential, multi-agency safeguarding programme designed to provide support to individuals who are vulnerable to being drawn into terrorism or extremist activity.

Where appropriate, and following assessment of risk, referrals may be made to Channel through local Prevent procedures. Participation in Channel is voluntary and aims to provide support before concerns escalate.

Promoting British Values

As part of its wider safeguarding and educational responsibilities, The Willows School promotes:

- democracy;
- the rule of law;
- individual liberty;
- mutual respect; and
- tolerance of different faiths, beliefs and cultures.

These values are embedded throughout school life, the curriculum, behaviour expectations and wider pastoral provision.

Safer Recruitment, Visitors and External Speakers

To support compliance with the Prevent Duty, the school will:

- operate safer recruitment procedures;
- undertake appropriate due diligence regarding visitors and external speakers;
- challenge and prevent access by extremist individuals where concerns arise;
- risk assess external events and presentations;
- ensure safeguarding expectations are understood by visitors; and
- maintain appropriate supervision of all external activities.

Filtering, Monitoring and Online Safety

The school will maintain appropriate filtering and monitoring systems, in line with KCSIE 2026 requirements, to reduce the risk of children accessing extremist, terrorist or harmful content online.

Online safety education will help pupils to:

- critically evaluate information;
- identify misinformation and disinformation;
- safely use digital technologies;
- understand online risks;
- report concerns; and
- seek support where needed.

Responding to Concerns

Where there are concerns that a child may be vulnerable to radicalisation, extremism or terrorism, The Willows School will:

- immediately involve the DSL;
- follow Lancashire Children's Safeguarding Assurance Partnership (CSAP) procedures;
- seek Prevent advice where appropriate;
- consider referral to Children's Social Care if safeguarding thresholds are met;
- consider referral to Channel where appropriate;
- liaise with Police and safeguarding partners where required; and
- ensure that the child's welfare remains central to all decision-making.

Further Guidance

The school will operate in accordance with:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance (latest edition)
- Lancashire Children's Safeguarding Assurance Partnership procedures
- Local Prevent and Channel procedures.

The welfare, safety and best interests of the child will always be the paramount consideration. Safeguarding children from radicalisation is part of the school's wider duty to protect children from abuse, neglect, exploitation and harm.

Our Single point of Contact in the school (SPOC): Rebecca Warhurst

Local Authority Prevent and Channel Team:

Service	Contact
Lancashire Prevent Team	01772 413398
Prevent Team Email	safeguardingeducationteam@lancashire.gov.uk
Prevent Education Officer	mash.education@lancashire.gov.uk
Police Prevent Team	01772 413398 (or non-emergency police number 101)
Prevent Referral Email	concern@lancashire.police.uk
Emergency	999

4.17 Sharing Nudes and Semi-nudes

The Willows School recognises that the sharing of nude and semi-nude images, videos and live streams by children is a safeguarding issue that requires a proportionate, child-centred and educational response. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, Searching, Screening and Confiscation: Advice for Schools, and the latest UK Council for Internet Safety (UKCIS) guidance: Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People, all incidents will be treated seriously and managed on a case-by-case basis.

The UKCIS guidance uses the term "sharing nudes and semi-nudes" to describe the creation, possession and sharing of nude or semi-nude images, videos or live streams by children under the age of 18. This may occur:

- online or offline;
- through social media platforms;
- messaging applications;
- gaming platforms;
- websites and forums;
- video-sharing platforms;
- live-streaming services; or
- device-to-device sharing technologies, such as AirDrop.

The school recognises that children and young people may use alternative terminology, including "nudes", "pics", "explicit images", "nude selfies" or similar terms.

Understanding the Context

The school recognises that the reasons children share nude and semi-nude images are varied and do not necessarily indicate criminal intent.

Incidents may arise through:

- consensual relationships between young people;
- peer pressure;
- coercion, manipulation or exploitation;
- grooming;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE);
- harmful sexual behaviour;
- online challenges or trends;
- bullying, humiliation or harassment;
- sexual extortion ("sextortion");
- abuse within intimate personal relationships;
- revenge or retaliatory behaviours;
- experimentation; or
- curiosity and age-related behaviour.

The school also recognises that some incidents involve the misuse of emerging technologies, including artificial intelligence (AI), image editing software and deepfake technology.

Examples may include:

- digitally manipulating a child's image into a sexualised image;
- creating AI-generated nude or semi-nude images of children;

- distributing edited or manipulated sexualised images without consent;
- falsely claiming that sexual images belong to another child;
- using images as part of bullying, coercion, blackmail or extortion; and
- sharing images to humiliate, shame, intimidate, exploit or control another child.

Safeguarding Principles

The school will always adopt a safeguarding-first approach.

Children involved in incidents relating to nude or semi-nude image sharing may be:

- victims of abuse;
- vulnerable to exploitation;
- experiencing coercion or pressure;
- displaying harmful sexual behaviour;
- affected by peer pressure or online influence; or
- requiring additional support and intervention.

No child should automatically be criminalised because they are involved in a nude or semi-nude image-sharing incident.

Staff Responsibilities

Any member of staff who becomes aware of an incident involving nude or semi-nude images must:

- remain calm and avoid judgement;
- reassure the child that they have done the right thing by speaking up;
- explain that the concern must be shared with safeguarding staff;
- not view, copy, print, share, store or forward images unnecessarily;
- follow safeguarding procedures immediately;
- report the concern to the Designated Safeguarding Lead (DSL) without delay;
- record the concern factually and objectively; and
- preserve evidence in accordance with safeguarding guidance.

Staff must not:

- investigate the matter themselves;
- request that a child forwards images;
- ask a child to produce or display imagery;
- share content with other staff unnecessarily;
- delete evidence before advice has been obtained; or
- promise confidentiality.

Role of the DSL

All concerns relating to nude and semi-nude image sharing must be reported immediately to the DSL or Deputy DSL.

The DSL will:

- undertake an initial safeguarding assessment;
- consider the age, understanding and developmental stage of the children involved;
- assess any evidence of coercion, exploitation, abuse or harmful sexual behaviour;
- consider the wishes, wellbeing and safety of the child affected;
- assess any ongoing risk to the child or others;

- consult statutory guidance where required;
- determine whether external agencies should be involved;
- consider whether content needs to be removed from online platforms;
- liaise with parents/carers where appropriate and safe to do so; and
- ensure all actions, decisions and rationales are appropriately recorded.

Referral Decisions

The school recognises that not all incidents require Police involvement.

The DSL will assess incidents using current UKCIS and KCSIE guidance and consider:

- whether the sharing was consensual or non-consensual;
- whether there is evidence of coercion, exploitation or manipulation;
- age differences between those involved;
- power imbalances;
- harmful sexual behaviour concerns;
- indicators of grooming;
- whether images have been shared widely;
- whether an adult is involved;
- whether a criminal offence may have occurred; and
- the ongoing safeguarding risk.

Where incidents involve:

- coercion;
- exploitation;
- blackmail or sextortion;
- threats or intimidation;
- sexual violence;
- harmful sexual behaviour;
- significant power imbalance;
- adults;
- trafficking;
- criminal exploitation; or
- other aggravating safeguarding factors,

the matter will normally be referred to Children's Social Care and/or the Police.

Supporting Children

The school will ensure that appropriate support is offered to:

- the child whose image has been shared;
- any child affected by the incident;
- children whose behaviour has caused concern;
- parents and carers where appropriate; and
- staff involved in managing the incident.

Support may include:

- pastoral support;
- emotional wellbeing support;
- mental health support;
- online safety education;

- restorative approaches where appropriate;
- Family Help involvement;
- specialist safeguarding support; and
- ongoing monitoring and review.

Removal of Images

Where Police or Children's Social Care involvement is not required, the school may support children and families to remove images from online platforms and services.

Advice and support may be sought from:

Professionals Online Safety Helpline

- Telephone: 0344 381 4772
- Email: helpline@saferinternet.org.uk

Further Support and Resources

Childline and IWF Report Remove

Report Remove allows children and young people under the age of 18 to confidentially report nude or sexual images and videos of themselves that they believe have been shared online and seek support to have them removed.

Additional resources include:

- UKCIS: *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People*
- Childnet resources on online sexual behaviour
- Internet Watch Foundation (IWF)
- Childline
- CEOP Education
- NSPCC Online Safety Resources

The DSL Role in Searching Devices, Viewing and Deleting Imagery

The school recognises that incidents involving nude or semi-nude images must be managed lawfully, proportionately and with the child's welfare at the centre of decision-making.

The powers to search, screen and confiscate electronic devices are set out within the Education Act 2011 and the Department for Education's Searching, Screening and Confiscation: Advice for Schools. Staff should exercise caution before undertaking any search of an electronic device.

Before any search takes place:

- the action must be carried out in accordance with the school's Safeguarding and Child Protection Policy and related policies, including Behaviour, Online Safety, Acceptable Use, Anti-Bullying and Data Protection policies;
- consideration must be given to the necessity, proportionality and safeguarding rationale for the search;
- the reasons for the search must be clearly documented; and

- the search should be authorised by the Headteacher or an authorised senior leader unless there is an immediate safeguarding risk requiring urgent action.

Viewing Imagery

In most cases, it will not be necessary for school staff to view nude or semi-nude imagery.

Imagery will only be viewed by the DSL where:

- it is the only way to establish sufficient facts to make informed safeguarding decisions;
- it is necessary to determine whether referrals to statutory agencies are required;
- it is necessary to support a report to a website, platform, app or reporting agency;
- it is necessary to support the child or parent/carers to have content removed;
- a pupil has directly presented the image to the DSL; or
- imagery has inadvertently been discovered on a school device, network or system.

If Viewing is Necessary

Where the DSL determines that an image must be viewed, they will:

- never copy, print, share, distribute or save the imagery;
- discuss the decision with the Headteacher wherever possible;
- ensure viewing is undertaken only by the DSL or a suitably authorised safeguarding professional;
- ensure another member of staff is present throughout the process, ideally the Headteacher or a senior leader;
- ensure viewing takes place in a secure location on school premises wherever possible;
- minimise the number of times imagery is viewed;
- wherever practical, ensure that the image is viewed by a staff member of the same sex as the child depicted;
- record fully the rationale for viewing the image; and
- record who was present, what decisions were made and any subsequent actions taken.

All decisions and actions relating to viewing imagery must be clearly documented on the school's safeguarding recording system.

Deleting Imagery

Where the DSL determines that Police or Children's Social Care involvement is not required, consideration may be given to supporting the child in deleting imagery from devices or accounts to reduce the risk of further sharing.

Before deleting imagery, the DSL will consider:

- whether the image may be required for evidential purposes;
- whether referrals are necessary;
- the safety and wishes of the child;
- guidance from external agencies where applicable; and
- statutory and local safeguarding guidance.

Where imagery is deleted, the DSL will ensure that safeguarding records clearly document:

- what action was taken;
- who was involved;
- the date and time;
- any advice received; and

- the rationale underpinning the decision.

Record Keeping

All concerns, disclosures, risk assessments, searches, decisions, referrals, support offered and outcomes relating to nude and semi-nude image sharing must be:

- recorded promptly and accurately;
- stored securely within the school's safeguarding system;
- reviewed by the DSL;
- monitored for patterns or repeat concerns; and
- managed in accordance with safeguarding and data protection requirements.

Local Procedures

Where concerns arise relating to nude or semi-nude image sharing, The Willows School will follow:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- UKCIS Sharing Nudes and Semi-Nudes Guidance (latest edition)
- Searching, Screening and Confiscation: Advice for Schools
- Lancashire Children's Safeguarding Assurance Partnership procedures
- Local child-on-child abuse, online safety and exploitation procedures.

The welfare, dignity, privacy and safety of the child will always be the paramount consideration. All incidents involving nude or semi-nude image sharing will be managed through a safeguarding and child protection framework, recognising that children involved may themselves be vulnerable, exploited or at risk of harm.

4.19 Children who are absent from Education (Including Persistent and Severe Absence)

The Willows School recognises that attendance, safeguarding and educational outcomes are closely linked. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, and the statutory guidance Working Together to Improve School Attendance, the school recognises that children who are absent from education, particularly those who are persistently absent, severely absent, missing education or experiencing unexplained absences, may be at increased risk of abuse, neglect, exploitation and other safeguarding harms.

The school acknowledges that poor attendance may be both a symptom and a cause of safeguarding concerns and therefore all unexplained, persistent or concerning absences will be considered through a safeguarding lens.

Safeguarding Risks Associated with Absence

Staff should be aware that children who are absent from education may be at increased risk of:

- neglect;
- child sexual abuse;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE);
- county lines activity;
- trafficking and modern slavery;
- domestic abuse;
- radicalisation;

- mental health difficulties;
- child-on-child abuse;
- forced marriage;
- female genital mutilation (FGM);
- serious violence;
- substance misuse; and
- other forms of abuse, neglect or exploitation.

The school recognises that repeated, prolonged, unexplained or persistent absence may be one of the earliest indicators that a child requires help, support or protection.

Attendance as a Safeguarding Priority

Children who are absent from education will be identified, monitored and supported at the earliest opportunity.

The school will:

- maintain accurate attendance records;
- monitor attendance patterns daily;
- identify emerging concerns promptly;
- work proactively with children and families;
- undertake appropriate safeguarding enquiries when concerns arise;
- work collaboratively with Children's Social Care, Family Help Services, the Local Authority and other agencies where appropriate; and
- ensure attendance concerns inform wider safeguarding assessments and decision-making.

Emergency Contact Information

The school will maintain a minimum of two emergency contacts for every child wherever possible.

To support safeguarding and attendance procedures, the school will:

- review contact information regularly;
- request updated details from parents/carers at least annually;
- encourage parents/carers to notify the school of changes immediately; and
- maintain accurate records on the school's management information systems.

First Day Response

The school will follow up all unexplained absences promptly.

Where a child is absent without explanation, the school will:

- make initial contact with parents/carers as soon as possible and ordinarily before 10.00am on the first day of absence;
- seek clarification regarding the reason for the absence;
- record all contact attempts and responses;
- escalate concerns where contact cannot be established; and
- consider safeguarding risks when assessing any unexplained absence.

Escalation of Concerns

Where contact cannot be established:

- alternative emergency contact numbers will be used;
- additional welfare enquiries may be undertaken;
- consideration will be given to carrying out a welfare visit;
- liaison may take place with relevant professionals already involved with the child and family;
- attendance and safeguarding records will be reviewed;
- concerns will be recorded on the safeguarding system; and
- a chronology of actions, enquiries and outcomes will be maintained.

The precise nature and timescale of enquiries will be determined by the child's age, vulnerability, safeguarding history, level of risk and individual circumstances.

Home Visits and Welfare Checks

Where attendance concerns persist and welfare cannot be established through normal communication channels, the school may undertake welfare visits in line with its Attendance Policy and safeguarding procedures.

Home visits will:

- be proportionate to the level of concern;
- be risk assessed;
- be appropriately recorded;
- contribute to safeguarding decision-making; and
- be undertaken by suitable staff members.

Where geographical distance or practical circumstances make a visit difficult, alternative arrangements such as secure video contact may be considered where appropriate.

Recording and Safeguarding Oversight

Where attendance concerns give rise to safeguarding concerns:

- a safeguarding record will be created on the school's safeguarding system;
- all actions, discussions and outcomes will be recorded;
- professional curiosity will be exercised;
- patterns of concern will be reviewed;
- the DSL will oversee safeguarding decision-making; and
- referrals to Children's Social Care or other agencies will be made where thresholds are met.

Children Missing Education (CME)

The school recognises that children who are missing education are particularly vulnerable.

The school will follow:

- Children Missing Education statutory guidance;
- local authority procedures;
- KCSIE 2026 requirements; and
- local safeguarding partnership protocols.

The school will notify the Local Authority as required where:

- a child leaves the school roll;
- a child's whereabouts are unknown;
- contact cannot be established;

- there are concerns regarding elective home education arrangements; or
- statutory reporting thresholds are met.

Children Looked After and Previously Looked After Children

For children who are looked after (CLA/LAC), the school will work closely with:

- the Virtual School;
- social workers;
- residential settings;
- foster carers;
- placing authorities; and
- other relevant professionals.

Where a looked after child is missing from care, absent, or has not returned from family time or agreed arrangements, the school will liaise promptly with the responsible professionals and contribute to safeguarding responses as appropriate.

Children with Court Involvement

The school recognises that some children may become involved in court proceedings as victims, witnesses or through family proceedings.

Where appropriate, staff will utilise resources and guidance designed to support children involved in the court system and will work with relevant professionals to ensure that children's educational, emotional and safeguarding needs are met.

Persistent and Severe Absence

The school recognises that:

- persistently absent children often face multiple barriers to attendance;
- severe absence may indicate significant unmet need or safeguarding concerns; and
- attendance interventions should be holistic, supportive and child-centred.

Where persistent or severe absence is identified, the school will:

- undertake a detailed assessment of barriers;
- engage with the child and family;
- consider Family Help involvement;
- consider safeguarding concerns;
- work with external agencies where appropriate; and
- implement support plans designed to improve attendance and reduce risk.

Multi-Agency Working

Where attendance concerns indicate wider safeguarding concerns, the school will work collaboratively with:

- Children's Social Care;
- Family Help Services;
- Attendance Services;
- Health Services;
- CAMHS;
- Youth Justice Services;
- Police;

- Housing Providers;
- Virtual School Heads; and
- safeguarding partners.

Further Guidance

The Willows School will manage attendance and safeguarding concerns in accordance with:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Working Together to Improve School Attendance (statutory guidance)
- Children Missing Education Guidance
- Lancashire Children's Safeguarding Assurance Partnership procedures
- Local Authority attendance and safeguarding protocols.

The school recognises that attendance is everyone's responsibility and that poor attendance, persistent absence and missing education may be indicators of abuse, neglect, exploitation or other safeguarding concerns. The welfare, safety and best interests of the child will remain paramount at all times.

5.0 Children Looked After, Children with a Social Worker, Children in Kinship Care, SEND and Children Living in Residential Settings

5.1 Children Looked After (CLA/LAC), Previously Looked After Children and Care Leavers

The Willows School recognises that children who are looked after, previously looked after, in kinship care arrangements, or who have experienced social care involvement often have increased vulnerability due to experiences of abuse, neglect, exploitation, trauma, loss, instability and adverse childhood experiences.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, and relevant statutory guidance, the school acknowledges that these children may face additional safeguarding, emotional, social and educational challenges and may require enhanced support to achieve positive outcomes.

The school will ensure that staff have the knowledge, skills and understanding necessary to safeguard and promote the welfare of children who are looked after, previously looked after or care experienced.

Appropriate staff will have access to relevant information regarding:

- the child's legal status;
- care arrangements;
- delegated authority arrangements;
- placement stability;
- educational history;
- safeguarding vulnerabilities;
- contact arrangements; and
- professionals involved with the child.

Responsibilities of the Designated Safeguarding Lead (DSL)

The DSL will ensure that they are aware of:

- the child's current legal status;
- the responsible Local Authority;

- the name and contact details of the Virtual School Head (VSH);
- the name and contact details of the child's Social Worker, where applicable;
- contact arrangements and any restrictions relating to family members;
- court orders or safeguarding plans;
- information-sharing agreements;
- who may access information relating to the child;
- any vulnerabilities relating to exploitation, missing episodes, mental health, self-harm or abuse; and
- where relevant, details of a Personal Adviser for care leavers.

The DSL will ensure that sensitive information is shared proportionately, lawfully and in accordance with the child's best interests, wishes and feelings.

Responsibilities of the Designated Teacher

The Designated Teacher is responsible for promoting the educational achievement, attendance, progress and wellbeing of children who are looked after and previously looked after.

Responsibilities include:

- promoting high educational aspirations and achievement;
- ensuring Personal Education Plans (PEPs) are completed, reviewed and monitored;
- contributing to statutory review processes;
- liaising with Social Workers, carers, the Virtual School and other professionals;
- monitoring attendance, progress, attainment and wellbeing;
- advocating on behalf of the child;
- supporting transitions;
- ensuring staff understand the needs of looked after and previously looked after children; and
- sharing safeguarding information appropriately with the DSL.

The Designated Teacher for The Willows School is: Jack Walsh

5.2 Virtual School Heads, Children in Kinship Care and Children with a Social Worker

The school recognises that children who have a social worker, have previously had a social worker, or are living in kinship care arrangements may face additional barriers affecting attendance, educational achievement, wellbeing and safety.

The school will identify and monitor children who:

- are looked after;
- are previously looked after;
- have a social worker;
- have previously had a social worker;
- are children in need;
- are subject to child protection plans;
- are living in kinship care arrangements; or
- are otherwise care experienced.

Relevant staff will work collaboratively with:

- Virtual School Heads;
- Children's Social Care;
- Family Help Services;

- carers;
- parents;
- safeguarding partners; and
- other appropriate agencies.

Virtual School Head Responsibilities

The school recognises the extended responsibilities of Virtual School Heads, including:

- promoting the educational achievement of children who have a social worker;
- promoting the educational achievement of children in kinship care arrangements;
- offering strategic advice, information and support to schools;
- helping schools understand barriers to learning and attendance; and
- supporting improved educational outcomes for vulnerable children.

The school will seek advice and support from Virtual School Heads where appropriate and will actively participate in multi-agency planning and review processes.

5.3 Children with Special Educational Needs and Disabilities (SEND)

The Willows School recognises that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges and may be at increased risk of abuse, neglect, exploitation, bullying, discrimination and child-on-child abuse.

Research continues to demonstrate that disabled children and children with SEND are significantly more vulnerable to abuse than their peers and may experience barriers to recognition, reporting and intervention.

The school recognises that safeguarding concerns may be harder to identify in children with SEND due to:

- communication differences;
- difficulties expressing concerns;
- reliance upon adults for personal care;
- social isolation;
- cognitive differences;
- behavioural presentations;
- difficulties recognising inappropriate behaviour;
- limited understanding of consent or healthy relationships; and
- unmet communication needs.

Safeguarding Principles for Children with SEND

Staff will remain alert to the possibility of safeguarding concerns and will not automatically assume that:

- behaviour is solely related to a child's SEND;
- injuries are accidental;
- distress is explained by disability or additional needs; or
- communication difficulties mean a child cannot disclose abuse.

Staff will maintain professional curiosity and consider whether indicators could represent:

- abuse;
- neglect;
- exploitation;
- bullying;
- emotional harm;

- coercive control;
- child-on-child abuse;
- child criminal exploitation (CCE);
- child sexual exploitation (CSE);
- fabricated or induced illness (FII);
- perplexing presentations;
- mental health concerns; or
- other safeguarding needs.

Communication and Child-Centred Practice

Staff will always consider:

- What do I know about this child?
- What is their developmental age and level of understanding?
- How do their needs affect communication and understanding?
- What adaptations do I need to make to ensure they can express themselves safely?
- How can I ensure the child's voice is heard?

The school will adapt communication methods as necessary, including:

- visual supports;
- communication aids;
- alternative and augmentative communication systems;
- assisted technology;
- social stories;
- supported conversations; and
- specialist professional input.

Inclusive Language

The school is committed to using respectful, inclusive and current terminology in all verbal and written communications.

Terminology used within safeguarding practice will reflect:

- the wishes of the child where possible;
- current statutory guidance;
- SEND best practice; and
- inclusive language principles.

The school recognises that language evolves and will review terminology regularly to ensure communication remains respectful and appropriate.

Specialist SEND Provision

The Willows School is an independent specialist school and all pupils are expected to have an Education, Health and Care Plan (EHCP).

The Headteacher coordinates SEND provision and ensures that safeguarding considerations are integrated into all SEND processes.

Annual Reviews will:

- include safeguarding considerations where relevant;

- consider attendance, wellbeing and vulnerability;
- include contributions from professionals who know the child well; and
- support joined-up planning and intervention.

The DSL and SEND leadership staff will liaise regularly regarding safeguarding concerns affecting pupils with SEND.

5.4 Children Living in Residential Children's Homes

The school recognises that some pupils may live in residential children's homes and that children living in residential care can experience increased vulnerability due to previous trauma, adverse childhood experiences, placement instability, exploitation risks and complex safeguarding histories.

The school acknowledges that residential care can be a protective factor for many children, whilst recognising the importance of continued vigilance regarding safeguarding risks.

Working with Children's Homes

The school will maintain effective professional relationships with:

- residential care staff;
- Registered Managers;
- Social Workers;
- Independent Reviewing Officers (IROs);
- Virtual School staff;
- Health professionals; and
- other safeguarding agencies.

The school will:

- share safeguarding information appropriately;
- contribute to care planning;
- support attendance and educational progress;
- contribute to statutory reviews;
- identify emerging risks;
- raise concerns promptly; and
- work collaboratively to promote safety and wellbeing.

Safeguarding Considerations

Staff should remain alert to risks including:

- children missing from care;
- child criminal exploitation;
- child sexual exploitation;
- county lines involvement;
- online exploitation;
- serious violence;
- self-harm;
- mental health concerns;
- placement instability;
- harmful sexual behaviour; and
- child-on-child abuse.

Where concerns arise, the DSL will work with residential staff and safeguarding partners to ensure appropriate protection, intervention and support.

Policy Links

This section should be read alongside:

- Safeguarding and Child Protection Policy
- Attendance Policy
- SEND Policy
- Behaviour Policy
- Anti-Bullying Policy
- Mental Health and Wellbeing Policy
- Online Safety Policy
- Child-on-Child Abuse Policy
- Missing From Education Procedures
- Children Missing From Care Procedures
- Equality and Inclusion Policy

The welfare, safety and best interests of the child remain paramount. The Willows School is committed to ensuring that all children, particularly those who are looked after, care experienced, have a social worker, live in kinship care arrangements, have SEND or live in residential settings, receive the support, protection and advocacy necessary to achieve positive outcomes and remain safe from harm.

6.0: STEPS TO SECURE A SAFER SCHOOL

6.1 Safer Recruitment, Staff Conduct and Safeguarding Culture

The Willows School is committed to ensuring that children are safeguarded through robust safer recruitment practices, effective staff conduct procedures and a strong safeguarding culture. In accordance with Keeping Children Safe in Education (KCSIE) 2026 Part Three, all recruitment, selection, induction and ongoing employment processes will place the welfare and safety of children at the centre of decision-making.

The school recognises that safeguarding is everyone's responsibility and that creating a safe culture requires vigilant recruitment processes, clear professional expectations, effective supervision, ongoing training and swift action when concerns arise.

Safer Recruitment

The school will operate safer recruitment procedures for all staff, supply staff, governors, trustees, agency workers, contractors, volunteers and individuals working in alternative provision in accordance with statutory guidance and relevant employment legislation.

Recruitment processes will include, as appropriate:

- scrutiny of employment history and career progression;
- obtaining and verifying references before appointment wherever possible;
- verification of identity;
- verification of address;
- verification of qualifications and professional status where required;
- right to work checks;

- enhanced Disclosure and Barring Service (DBS) checks;
- barred list checks where regulated activity is undertaken;
- prohibition from teaching checks;
- Section 128 checks where applicable;
- overseas criminal record checks and other relevant checks for individuals who have lived or worked abroad;
- verification of professional registration where appropriate;
- online searches on shortlisted candidates as part of due diligence; and
- any other checks required by KCSIE 2026.

The school will maintain a compliant and up-to-date Single Central Record (SCR) detailing all required recruitment and vetting checks.

At least one person involved in recruitment panels will have undertaken appropriate safer recruitment training in line with statutory expectations.

Induction and Ongoing Safeguarding Responsibilities

All newly appointed staff and volunteers will receive safeguarding induction which includes:

- the Safeguarding and Child Protection Policy;
- Part One (and Annex B where appropriate) of KCSIE 2026;
- the Staff Behaviour Policy / Code of Conduct;
- the Behaviour Policy;
- the Online Safety Policy;
- safeguarding reporting procedures;
- the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs;
- whistleblowing procedures;
- low-level concerns procedures; and
- expectations regarding professional conduct.

Safeguarding training will be updated regularly in accordance with statutory requirements and emerging safeguarding risks.

Staff Behaviour Policy / Code of Conduct

The school's Staff Behaviour Policy (Code of Conduct) sets clear expectations for all adults working in or on behalf of the school.

The policy includes guidance regarding:

- professional boundaries;
- maintaining appropriate relationships with pupils;
- respectful and inclusive behaviour;
- use of language;
- confidentiality;
- gifts and hospitality;
- one-to-one working;
- physical contact;
- educational visits;
- safeguarding responsibilities;
- whistleblowing;
- low-level concerns;
- allegations management;
- online conduct;

- use of technology;
- use of personal devices;
- social media activity; and
- conduct outside the workplace where it may affect suitability to work with children.

All adults working within the school are expected to act as role models and uphold the highest standards of personal and professional conduct at all times.

Low-Level Concerns

The Willows School promotes a culture of openness, transparency and professional curiosity.

All staff are expected to report concerns, however small, about their own behaviour or the behaviour of another adult working with children where that behaviour:

- is inconsistent with the Staff Behaviour Policy;
- causes concern regarding professional boundaries; or
- may indicate that safeguarding standards are not being maintained.

Low-level concerns will be managed in accordance with KCSIE 2026 and the school's Low-Level Concerns Procedure.

The school recognises that effective management of low-level concerns helps to:

- identify concerning patterns of behaviour;
- strengthen safeguarding culture;
- promote accountability;
- encourage self-reflection; and
- prevent escalation to more serious concerns.

Allegations Against Staff and Other Adults

All allegations, concerns or complaints regarding adults working with children will be managed in accordance with:

- KCSIE 2026 Part Four;
- Working Together to Safeguard Children 2026;
- local safeguarding partnership procedures; and
- Local Authority Designated Officer (LADO) procedures.

This includes allegations relating to:

- conduct towards children;
- behaviour outside of school;
- online activity;
- social media use;
- abuse of position of trust;
- inappropriate relationships;
- criminal conduct; and
- safeguarding concerns arising in any setting.

Appropriate referrals will be made to external agencies where the statutory threshold is met.

Filtering, Monitoring and Online Safety

In accordance with KCSIE 2026 and Department for Education expectations, The Willows School has robust filtering and monitoring systems in place to safeguard children when using school technology.

The school will ensure that:

- filtering systems effectively restrict access to harmful and inappropriate content;
- monitoring systems identify safeguarding concerns and online risks;
- responsibilities for filtering and monitoring are clearly assigned;
- safeguarding and IT leads work collaboratively;
- systems are regularly reviewed and tested;
- governors receive appropriate assurance regarding effectiveness; and
- arrangements are appropriate to the age, needs and vulnerabilities of pupils.

The governing body and leadership team will maintain strategic oversight of filtering and monitoring arrangements and ensure they remain effective in response to new and emerging risks, including AI-enabled harms, online exploitation and extremist content.

Referrals to the DBS and Teaching Regulation Agency

Where safeguarding thresholds are met, the school has a legal duty to make referrals as appropriate.

Referrals will be made to the:

Disclosure and Barring Service (DBS) where a person has:

- harmed a child;
- posed a risk of harm to a child;
- satisfied the harm test; or
- been removed from regulated activity due to safeguarding concerns.

Referrals will be made to the:

Teaching Regulation Agency (TRA) where a teacher's conduct may amount to:

- serious misconduct;
- unacceptable professional conduct;
- conduct that may bring the profession into disrepute; or
- relevant criminal offences.

The school will also comply with any statutory reporting obligations relating to safeguarding, prohibition orders and professional regulation.

Responsibilities of the Governing Body and Proprietor

The Governing Body and Proprietor Body are responsible for ensuring that:

- safer recruitment practices are fully embedded and consistently applied;
- appropriate safeguarding policies are in place and reviewed annually;
- the Single Central Record is maintained and monitored;
- safeguarding audits and compliance checks are undertaken;
- filtering and monitoring systems are effective and subject to regular review;
- safeguarding training requirements are met;
- effective oversight of allegations management procedures is maintained;

- low-level concerns procedures are implemented effectively;
- the Staff Behaviour Policy/Code of Conduct is understood and followed by all staff and volunteers;
- appropriate challenge and scrutiny are provided regarding safeguarding arrangements; and
- statutory safeguarding duties are fulfilled.

Safeguarding Culture

The Willows School is committed to maintaining a safeguarding culture in which:

- children are protected from harm;
- safeguarding concerns are shared promptly;
- professional curiosity is encouraged;
- poor practice is challenged;
- staff feel confident to raise concerns;
- safeguarding responsibilities are understood by everyone; and
- children's welfare remains the paramount consideration.

The safety, welfare and best interests of children underpin all safer recruitment, staff conduct and safeguarding arrangements within The Willows School.

6.2 Staff Training and Induction

The Willows School recognises that effective safeguarding depends upon all staff having the knowledge, skills, confidence and support necessary to identify concerns, respond appropriately and fulfil their safeguarding responsibilities. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, and local safeguarding partnership requirements, all staff will receive safeguarding and child protection training that is regularly updated and appropriate to their role.

Staff Induction

All new staff, including permanent staff, temporary staff, agency staff, governors, trustees, volunteers and contractors who regularly work with children, will receive safeguarding and child protection induction on or before their first day of work.

This induction will be delivered by the Designated Safeguarding Lead (DSL), Deputy DSL, or another appropriately trained safeguarding leader and will include:

- the school's Safeguarding and Child Protection Policy;
- Part One (and Annex B where appropriate) of Keeping Children Safe in Education (KCSIE) 2026;
- the identity and role of the DSL and Deputy DSLs;
- the Staff Behaviour Policy / Code of Conduct;
- the Behaviour, Rewards and Sanctions Policy;
- the Online Safety Policy;
- the school's procedures for reporting and recording safeguarding concerns;
- safeguarding arrangements for children who are absent from education or missing education;
- child-on-child abuse procedures;
- whistleblowing procedures;
- low-level concerns procedures;
- acceptable use of technology and professional online conduct;
- safeguarding expectations relating to equality, diversity and inclusion;
- the safeguarding response to children who require mental health support; and
- current safeguarding themes, risks and local priorities.

Staff will be given access to all relevant safeguarding policies and procedures and will be expected to confirm that they have read and understood them.

Supply Staff, Agency Staff and Volunteers

All supply staff, agency staff and volunteers will receive safeguarding information appropriate to their role and level of contact with children.

This will include:

- the identity of the DSL and Deputy DSLs;
- how to report safeguarding concerns;
- how to record safeguarding concerns;
- emergency safeguarding procedures;
- a safeguarding summary or safeguarding information leaflet;
- expectations regarding professional conduct; and
- relevant safeguarding and behaviour procedures.

Where appropriate, they will also be provided with access to:

- the Safeguarding and Child Protection Policy;
- the Staff Behaviour Policy / Code of Conduct;
- the Behaviour Policy;
- child-on-child abuse procedures;
- whistleblowing arrangements; and
- low-level concerns arrangements.

Whole School Safeguarding Training

All staff, including the Headteacher and senior leaders, will receive safeguarding and child protection training that is:

- regularly updated;
- appropriate to their role;
- aligned to current safeguarding legislation and guidance;
- responsive to emerging safeguarding risks and local priorities; and
- recorded as part of the school's safeguarding training programme.

Training will include, but not be limited to:

- recognising indicators of abuse, neglect and exploitation;
- child-on-child abuse;
- sexual violence and sexual harassment;
- harmful sexual behaviour;
- online safety and cyber risks;
- filtering and monitoring;
- child criminal exploitation (CCE);
- child sexual exploitation (CSE);
- county lines;
- modern slavery and trafficking;
- domestic abuse;
- mental health, self-harm and suicidal ideation;
- children who are absent from education;
- children with SEND;
- Prevent and radicalisation;

- professional curiosity;
- information sharing;
- multi-agency working;
- contextual safeguarding; and
- local safeguarding procedures.

Safeguarding Updates

In addition to formal training, all staff will receive regular safeguarding updates throughout the academic year.

Updates may be delivered through:

- staff meetings;
- safeguarding briefings;
- bulletins and newsletters;
- email updates;
- local safeguarding partnership communications;
- online learning modules;
- professional discussions; and
- lessons learned from safeguarding reviews and practice updates.

These updates will ensure that staff remain aware of:

- local safeguarding trends;
- emerging risks;
- changes to legislation and statutory guidance;
- learning from serious child safeguarding incidents;
- online safety developments; and
- local authority and safeguarding partnership priorities.

Designated Safeguarding Lead (DSL) Training

The Designated Safeguarding Lead and Deputy DSLs will undertake advanced safeguarding training appropriate to their roles.

The DSL and Deputy DSLs will:

- complete DSL safeguarding training at intervals required by statutory guidance;
- undertake regular continuing professional development (CPD);
- maintain up-to-date knowledge of safeguarding legislation, policy and practice;
- participate in safeguarding networks and professional forums;
- attend local safeguarding partnership briefings and events where appropriate;
- engage with local and national safeguarding developments;
- undertake additional learning relating to emerging risks; and
- disseminate safeguarding developments to staff.

This ongoing professional development will occur in addition to mandatory refresher training and any training required by Branches Education Group, the Local Authority or safeguarding partners.

Governance and Oversight

The Governing Body/Proprietor Body will ensure that:

- safeguarding training arrangements comply with KCSIE 2026;

- all staff receive appropriate induction and ongoing training;
- safeguarding training records are maintained;
- DSLs are afforded sufficient time, funding, supervision and resources to fulfil their responsibilities;
- safeguarding knowledge is regularly refreshed across the workforce; and
- safeguarding remains a standing priority across the school.

Monitoring and Record Keeping

The school will maintain accurate records of:

- safeguarding induction;
- whole-school safeguarding training;
- DSL training;
- safeguarding updates;
- specialist safeguarding training; and
- attendance at safeguarding briefings and professional development activities.

Training records will be reviewed regularly to ensure compliance with statutory requirements and school expectations.

The Willows School is committed to maintaining a safeguarding culture in which all staff understand their responsibilities, feel confident to act on concerns and receive the training and support necessary to protect children from abuse, neglect, exploitation and harm. The welfare of the child will always be paramount.

6.3 Whistleblowing and Raising Concerns About a Colleague

The Willows School is committed to maintaining a culture of openness, transparency, accountability and safeguarding vigilance. All staff have a responsibility to safeguard and promote the welfare of children and must act if they have concerns regarding the behaviour, conduct or suitability of any adult working with children.

The school recognises that raising concerns about a colleague can be difficult. Staff may worry that they have misunderstood a situation, may be concerned about the impact on professional relationships, or may fear that reporting concerns could affect a colleague's career. However, the welfare and safety of the child must always be the paramount consideration.

In accordance with Keeping Children Safe in Education (KCSIE) 2026 Part Four, all staff are expected to report concerns about adults working in or on behalf of the school, including employees, supply staff, agency workers, contractors, volunteers, governors, trustees and visitors.

Branches Education Group operates a Whistleblowing Policy which enables staff to raise concerns confidentially and, where appropriate, anonymously. Staff who raise concerns in good faith will be supported and will not suffer detriment, victimisation or disadvantage as a result of doing so.

All concerns relating to poor practice, inappropriate conduct, safeguarding breaches or possible abuse by an adult must be reported immediately.

- Concerns regarding a member of staff must be reported to the Headteacher.
- Concerns regarding the Headteacher must be reported directly to the Governance Chair.
- Concerns regarding the Chair of Governance should be referred to the Proprietor, Local Authority Designated Officer (LADO), Children's Social Care or the Police as appropriate.

Staff may also make direct referrals to Children's Social Care, the Police, the LADO, Ofsted or the NSPCC Whistleblowing Advice Line if they believe that immediate action is required to safeguard a child or if concerns are not being addressed appropriately.

NSPCC Whistleblowing Advice Line

- Telephone: 0800 028 0285
- Email: help@nspcc.org.uk

6.4 Concerns About the Behaviour and/or Conduct of Adults

The Willows School recognises that maintaining a strong safeguarding culture requires all concerns about adults working with children to be identified, reported, recorded and managed appropriately.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, concerns regarding adults working in or on behalf of the school will generally fall into one of two categories:

1. Allegations That Meet the Harm Threshold

An allegation may meet the harm threshold where an adult has:

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

Any concern that may meet the allegation threshold must be reported immediately to the Headteacher (as Case Manager).

Where the concern relates to the Headteacher, it must be reported immediately to the Governance Chair.

Such concerns will be managed in accordance with:

- KCSIE 2026 Part Four;
- the school's Managing Allegations Against Staff Policy;
- Local Authority Designated Officer (LADO) procedures;
- Working Together to Safeguard Children 2026; and
- local safeguarding partnership procedures.

2. Low-Level Concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a manner which:

- is inconsistent with the Staff Behaviour Policy (Code of Conduct);
- falls below expected professional standards; or
- has caused a sense of unease, concern or professional curiosity regarding professional boundaries.

Examples may include:

- inappropriate language;
- over-familiarity;

- inconsistent professional boundaries;
- inappropriate use of technology or social media;
- favouritism;
- breaches of school procedures; or
- behaviours that may not meet the allegation threshold but warrant discussion, reflection or monitoring.

Any low-level concern must be reported immediately to the Headteacher.

Where the concern relates to the Headteacher, it must be reported to the Governance Chair.

Self-Reporting

To promote a culture of openness and accountability, staff are encouraged to self-report where they believe their own behaviour may have:

- fallen below expected professional standards;
- been misunderstood;
- breached school procedures; or
- caused concern or discomfort to another person.

Self-reporting will be considered within the context of safeguarding, professional conduct and the school's commitment to reflective practice.

Recording Concerns

All concerns relating to the conduct or behaviour of adults working in or on behalf of the school must be recorded appropriately.

The member of staff raising the concern must ensure that:

- the concern is reported immediately;
- a factual record is made;
- safeguarding procedures are followed; and
- the concern is recorded on the safeguarding recording system before the end of the working day on which it is reported.

Records will be logged as:

- Employee Concern for employed staff; or
- Other Adult Concern for supply staff, agency staff, contractors, volunteers or other adults working on behalf of the school.

Records will include:

- the nature of the concern;
- the date and time the concern was raised;
- who reported the concern;
- actions taken;
- decisions made; and
- subsequent outcomes.

Safeguarding Culture

The school expects all adults to:

- maintain professional curiosity;
- challenge behaviours that fall below expected standards;
- act in the best interests of children;
- uphold the Staff Behaviour Policy (Code of Conduct);
- report concerns promptly; and
- contribute to a culture where safeguarding is everyone's responsibility.

No concern is too small to report. Early reporting of concerns helps protect children, supports staff and promotes a safe and transparent safeguarding culture. The welfare of children will always remain the paramount consideration.

6.5 Management of Allegations Against Staff, Supply Staff, Volunteers and Other Adults

The Willows School recognises that it has a duty to safeguard and promote the welfare of children and to manage allegations against adults fairly, consistently, promptly and in accordance with statutory guidance. The school will follow Part Four of Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, Local Authority Designated Officer (LADO) procedures and local safeguarding partnership guidance when managing allegations and concerns relating to adults working with children.

These procedures apply to all adults working in or on behalf of the school, including:

- employees;
- agency and supply staff;
- volunteers;
- governors and trustees;
- contractors;
- visitors;
- peripatetic staff;
- alternative provision staff; and
- anyone undertaking work on behalf of the school.

The school recognises that allegations and concerns must be addressed appropriately to protect children, maintain public confidence and ensure that adults are treated fairly and in accordance with employment law and statutory guidance.

Allegations That Meet the Harm Threshold

The procedures outlined within the school's Allegations Against Staff Policy will be followed where it is alleged that an adult working in or on behalf of the school has:

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

These concerns are often referred to as allegations that meet the harm threshold.

Reporting Allegations

Any allegation or concern that may meet the harm threshold must be reported immediately.

- Allegations against a member of staff must be reported immediately to the Headteacher.
- Allegations against the Headteacher must be reported immediately to the Governance Chair.
- Allegations against the Governance Chair should be reported to the Proprietor and/or the Local Authority Designated Officer (LADO).

The individual receiving the allegation becomes the Case Manager and is responsible for ensuring that appropriate procedures are followed.

The Case Manager must not investigate the allegation before seeking advice from the LADO.

Initial Response

The Case Manager will:

- ensure that the child is safe;
- obtain a clear factual account of the concern;
- avoid undertaking detailed investigations;
- preserve evidence where appropriate;
- contact the LADO without delay where the harm threshold may be met;
- consider whether immediate safeguarding action is required; and
- ensure appropriate records are maintained.

Role of the Local Authority Designated Officer (LADO)

The Case Manager will consult with the LADO to determine:

- whether the allegation meets the harm threshold;
- whether a strategy discussion or meeting is required;
- whether Children's Social Care involvement is required;
- whether Police involvement is required;
- the appropriate next steps; and
- how information should be shared.

Lancashire Local Authority Designated Officer (LADO)

Telephone: 01772 536694

Email: LADO.Admin@lancashire.gov.uk

Immediate Child Safeguarding Concerns: Call Children's Social Care at 0300 123 6720 (or out of hours at 0300 123 6722)

The school will always use the most current contact information published by Lancashire Safeguarding Children Partnership and the Local Authority.

Managing Investigations

Where an allegation meets the harm threshold, investigations may involve:

- Children's Social Care;
- the Police;

- the Local Authority;
- Human Resources;
- regulatory bodies; and
- other relevant agencies.

The school recognises the importance of:

- confidentiality;
- fairness;
- proportionality;
- timely decision-making; and
- supporting all parties throughout the process.

Referrals to the Disclosure and Barring Service (DBS)

Where an allegation is substantiated and:

- the member of staff is dismissed;
- the member of staff resigns before disciplinary proceedings are concluded;
- the member of staff retires;
- the member of staff otherwise ceases to provide services; or
- the school ceases to use a person's services,

the Case Manager will consider, in consultation with Human Resources and the LADO, whether there is a legal duty to make a referral to the Disclosure and Barring Service (DBS).

Referrals will be made where the legal criteria are met, including where the individual has:

- harmed a child;
- posed a risk of harm to a child; or
- satisfied the DBS harm test.

Referrals to the Teaching Regulation Agency (TRA)

Where concerns relate to a teacher, the Case Manager will consider whether a referral should be made to the Teaching Regulation Agency (TRA).

Referrals may be appropriate where conduct amounts to:

- serious misconduct;
- unacceptable professional conduct;
- conduct likely to bring the profession into disrepute; or
- relevant criminal behaviour.

Support for Children and Adults

The school recognises that allegations can be distressing for all parties involved.

Appropriate support will be considered for:

- the child or children involved;
- parents and carers;
- witnesses;
- the member of staff concerned; and
- staff supporting the process.

The welfare and safety of the child will remain the paramount consideration throughout.

Communication with Parents and Carers

Parents or carers of the child concerned will:

- be informed as soon as possible, subject to advice from the LADO, Police and Children's Social Care;
- be kept updated regarding matters directly relating to their child;
- be supported throughout the process; and
- be advised regarding confidentiality requirements.

No information relating to the employment or disciplinary matters of a staff member will be disclosed inappropriately.

The school will comply with legal reporting restrictions, including those contained within the Education Act 2002, relating to allegations against teachers.

Record Keeping

The Case Manager will ensure that:

- all allegations are recorded comprehensively;
- decisions and rationales are documented;
- outcomes are clearly recorded;
- records are retained in accordance with statutory requirements; and
- safeguarding records are maintained securely and confidentially.

6.6 Low-Level Concerns

The Willows School recognises the importance of creating a culture of openness, trust, transparency and accountability.

In accordance with KCSIE 2026, the school operates procedures for managing low-level concerns about adults working in or on behalf of the school.

A low-level concern is any concern, no matter how small, that an adult working with children may have acted in a way that:

- is inconsistent with the Staff Behaviour Policy (Code of Conduct), including conduct outside work; and
- does not meet the harm threshold for referral to the LADO.

Examples may include:

- over-familiarity with children;
- inappropriate language;
- boundary issues;
- favouritism;
- inappropriate electronic communication;
- inappropriate use of technology or social media;
- breaches of professional expectations; or
- behaviour that causes concern but does not meet the allegation threshold.

Purpose of the Low-Level Concerns Procedure

The purpose of the procedure is to:

- identify concerning behaviour early;
- prevent escalation;
- maintain professional standards;
- encourage reflection and accountability;
- strengthen safeguarding culture; and
- protect both children and staff.

Reporting Low-Level Concerns

All staff have a responsibility to report low-level concerns promptly.

Low-level concerns must be reported:

- to the Headteacher; or
- to the Governance Chair where the concern relates to the Headteacher.

Staff are encouraged to self-report where they believe their own behaviour may have:

- fallen below expected professional standards;
- been misunderstood; or
- breached the Staff Behaviour Policy.

Recording Low-Level Concerns

All low-level concerns will be:

- recorded promptly;
- reviewed by the Headteacher (or Governance Chair where appropriate);
- assessed to determine whether patterns of behaviour are emerging;
- retained in accordance with statutory guidance; and
- managed separately from personnel files where appropriate.

All concerns relating to adults working in or on behalf of the school must be recorded on the safeguarding system as:

- Employee Concern, or
- Other Adult Concern (for agency staff, volunteers, contractors and other adults).

Records should be completed before the end of the working day on which the concern is reported.

Related Policies

This section should be read alongside:

- Allegations Against Staff Policy
- Low-Level Concerns Policy
- Staff Behaviour Policy / Code of Conduct
- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Disciplinary Policy

The Willows School is committed to fostering a safeguarding culture in which concerns are shared openly, addressed promptly and managed fairly. The welfare and safety of children will always remain the paramount consideration.

6.7 Reasonable Force and Restrictive Physical Interventions

The Willows School recognises that there are circumstances in which it may be necessary for staff to use reasonable force or restrictive physical intervention to prevent injury, serious damage to property, serious disruption, or to safeguard a child or others from harm. In accordance with Keeping Children Safe in Education (KCSIE) 2026, the Education and Inspections Act 2006, Department for Education guidance Use of Reasonable Force in Schools, and relevant health and safety and safeguarding legislation, any use of force will be lawful, proportionate, necessary and used only in the best interests of the child and others involved.

The term reasonable force covers a broad range of actions involving physical contact with a child. This can include:

- guiding or escorting a child to safety;
- physically separating pupils involved in conflict;
- preventing a child from leaving a safe environment where doing so would place them at risk;
- blocking a child's path;
- preventing a child from harming themselves;
- preventing a child from harming others; or
- using an approved restrictive physical intervention as a last resort.

The school recognises that the use of physical intervention is a safeguarding matter and should always be viewed within the context of promoting the welfare, dignity and safety of children.

Principles Governing the Use of Reasonable Force

The use of reasonable force or restrictive physical intervention will always be:

- lawful;
- necessary;
- proportionate;
- reasonable in the circumstances;
- in the child's best interests;
- the minimum intervention required; and
- used for the shortest possible time.

The decision to use reasonable force is a matter of professional judgement and must take account of:

- the individual circumstances of the incident;
- the age, understanding and needs of the child;
- any known SEND, medical or mental health needs;
- the level of risk presented;
- the immediacy of the risk; and
- the availability of alternative responses.

Prevention and De-Escalation

The Willows School is committed to reducing the need for physical intervention through proactive and preventative approaches.

Staff will:

- build positive relationships with pupils;
- understand individual needs and triggers;
- follow Behaviour Support Plans and Risk Assessments;
- use trauma-informed approaches;
- employ communication and de-escalation strategies;
- make reasonable adjustments for pupils with SEND;
- use positive behaviour support techniques; and
- seek to prevent situations from escalating wherever possible.

Restrictive physical intervention should only be considered when other appropriate strategies have been unsuccessful, are inappropriate, or where immediate action is required to prevent harm.

Recording Incidents

Any use of reasonable force or restrictive physical intervention must be recorded in accordance with school procedures.

Records will include:

- the date, time and location;
- those involved;
- the reason the intervention was necessary;
- de-escalation strategies attempted;
- the nature and duration of the intervention;
- any injuries sustained;
- witnesses present;
- actions taken following the incident; and
- parental/carers notification where appropriate.

The Headteacher and DSL will review incidents regularly to identify patterns, risks and opportunities for learning or additional support.

Injuries Sustained During Physical Intervention

The school recognises that on rare occasions injuries may occur to pupils or staff during the use of reasonable force or restrictive physical intervention, even where approved techniques are used appropriately and proportionately.

Any injury sustained during an intervention will be:

- assessed promptly;
- treated appropriately;
- recorded fully;
- reported to the Headteacher;
- considered as part of a post-incident review; and
- reported to parents/carers and other relevant professionals where appropriate.

Minor Injuries

Where minor injuries occur, such as:

- superficial scratches;
- minor bruising;
- minor abrasions; or
- accidental low-level physical contact injuries,

the incident will be recorded and reviewed by the Headteacher.

The Headteacher will consider:

- the context of the incident;
- whether approved and trained techniques were used;
- whether the force used was reasonable and proportionate;
- whether there are any safeguarding concerns;
- whether a complaint has been made; and
- whether any further action is required.

Reviewing Patterns and Emerging Concerns

Particular attention will be paid to any emerging patterns including:

- repeated injuries involving the same child;
- repeated involvement of the same member of staff;
- recurring complaints;
- similar incidents occurring over time;
- concerns about practice; or
- indications that support plans require review.

Where patterns emerge, the Headteacher, DSL and relevant leaders will review the circumstances and consider whether additional action, supervision, training, support or investigation is required.

Consultation with the Local Authority Designated Officer (LADO)

The Headteacher will seek advice from, or make a referral to, the Local Authority Designated Officer (LADO) where there are concerns that the conduct of a member of staff may have harmed a child or where the threshold for an allegation may have been met.

The Headteacher will normally consult with the LADO where:

- a child sustains an injury that is more than minor bruising or superficial abrasions;
- the injury appears inconsistent with the reported circumstances;
- a child alleges inappropriate use of force;
- a child wishes to make a complaint about how they were restrained;
- a parent, carer, social worker or another professional raises a complaint;
- concerns are raised regarding staff conduct;
- there is evidence of repeated similar incidents; or
- there is uncertainty regarding whether the allegation threshold has been met.

In cases of doubt, the Headteacher will seek advice from:

- the LADO;
- Children's Social Care;
- safeguarding partners;
- Human Resources; and/or
- senior leaders within Branches Education Group.

Post-Incident Support

Following any significant incident involving reasonable force or restrictive physical intervention, consideration will be given to providing support for:

- the child involved;
- affected peers;
- staff involved in the intervention; and
- parents/carers.

Where appropriate, the school may:

- review Behaviour Support Plans;
- review Risk Assessments;
- undertake restorative conversations;
- hold multi-agency meetings;
- seek specialist advice; and
- implement additional support measures.

Monitoring and Oversight

The Headteacher and DSL will maintain oversight of all incidents involving reasonable force and restrictive physical intervention to ensure that:

- interventions remain lawful and proportionate;
- safeguarding concerns are identified promptly;
- any patterns are addressed;
- staff training remains appropriate and current;
- pupils' rights, dignity and welfare are protected; and
- lessons learned inform future practice.

Related Policies and Guidance

This section should be read alongside:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Restrictive Physical Intervention Policy
- Staff Behaviour Policy / Code of Conduct
- Allegations Against Staff Policy
- SEND Policy
- Health and Safety Policy
- Risk Assessment Procedures

The school will act in accordance with:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Use of Reasonable Force: Advice for Headteachers, Staff and Governing Bodies
- Education and Inspections Act 2006
- Local Safeguarding Partnership Procedures and LADO guidance.

The welfare, dignity, rights and safety of the child will always be the paramount consideration. Any use of reasonable force or restrictive physical intervention will be a last resort, used only when necessary to prevent harm and always in the least restrictive manner possible.

6.7i Recording and Reporting of Restrictive Interventions

Following the implementation of the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025, which came into force on 1 April 2026, The Willows School complies with the statutory requirements relating to the recording and reporting of incidents involving reasonable force, restraint and seclusion.

The school also follows the Department for Education's statutory guidance Restrictive Interventions, Including the Use of Reasonable Force, in Schools (2026). The sections relating to recording and reporting incidents are statutory and must be followed by schools.

The use of restrictive interventions is treated as both a safeguarding and behaviour management matter and is subject to appropriate leadership oversight, monitoring and review. The school's approach prioritises prevention, early intervention, de-escalation and positive behaviour support.

Scope

For the purposes of this policy, the recording and reporting requirements apply to significant incidents involving:

- the use of reasonable force;
- restraint, including non-force related restraint; and
- seclusion.

The school recognises that restrictive interventions may be particularly relevant for some children with SEND, Social, Emotional and Mental Health (SEMH) needs, communication differences or complex behavioural needs. Any intervention must be lawful, necessary, proportionate and in the child's best interests.

Recording of Incidents

The Willows School has procedures in place to ensure that every significant incident involving reasonable force, restraint or seclusion is recorded in writing as soon as practicable and, in all circumstances, on the same day as the incident.

A standard Restrictive Intervention Record Form will be completed and stored securely in accordance with safeguarding, behaviour and data protection requirements.

Minimum Recording Requirements

As a minimum, records will contain:

- the name of the child;
- the names of staff involved;
- the child's relevant needs, vulnerabilities or circumstances, including SEND where applicable;
- the date, time, location and duration of the incident;
- a factual account of the events leading to the intervention;
- the reason the intervention was considered necessary;
- de-escalation, preventative or diversionary strategies attempted before the intervention;
- the type of restrictive intervention used;
- the type and degree of force used where applicable;
- details of any restraint or seclusion used;
- any injuries sustained by the child or staff;
- any medical intervention required;

- post-incident support provided;
- parental contact and reporting arrangements; and
- any follow-up actions, reviews or amendments to support plans.

Records will be reviewed by the Headteacher, DSL and relevant senior leaders as part of safeguarding, behaviour and risk management processes. Trends and patterns will be analysed to support continuous improvement and reduce the need for future interventions.

Reporting to Parents and Carers

In accordance with statutory guidance, parents/carers will normally be informed about incidents involving reasonable force, restraint or seclusion as soon as reasonably practicable and ordinarily on the same day.

This requirement applies even where restrictive interventions form part of an agreed Behaviour Support Plan, Risk Assessment or Education, Health and Care Plan (EHCP).

Information Shared with Parents

Reports to parents/carers will, as a minimum, include:

- when and where the incident occurred;
- the duration of the incident;
- why the intervention was considered necessary;
- the preventative and de-escalation measures attempted beforehand;
- the type of intervention used;
- the type and degree of force used (where applicable);
- details of any injuries sustained;
- any post-incident support provided; and
- any proposed follow-up actions.

Parents and carers may be invited to discuss the incident, review support arrangements and contribute to future planning where appropriate.

Safeguarding Considerations

The school recognises that restrictive interventions can be distressing for children and staff and therefore every incident will be considered through a safeguarding lens.

Following an incident, consideration will be given to:

- the child's physical wellbeing;
- emotional wellbeing;
- communication needs;
- trauma history;
- SEND-related needs;
- whether safeguarding concerns have emerged;
- whether additional support is required; and
- whether referrals to external agencies are necessary.

Where injuries occur or concerns are raised regarding the appropriateness of an intervention, the Headteacher will consider consultation with the Local Authority Designated Officer (LADO) in accordance with the school's allegations procedures.

Risk Assessments, SEND and Behaviour Support Planning

Where there is a foreseeable likelihood that restrictive intervention may be required, the school will ensure that:

- individual Risk Assessments are in place;
- Behaviour Support Plans are developed and reviewed regularly;
- pupils' views are sought wherever possible;
- parents/carers are involved in planning;
- reasonable adjustments are considered;
- SEND needs are fully understood; and
- staff receive appropriate training and supervision.

This reflects the 2026 DfE emphasis on prevention, personalised support and minimising the use of restrictive interventions wherever possible.

Leadership Oversight and Quality Assurance

The Headteacher, DSL and senior leaders will maintain oversight of:

- all restrictive intervention records;
- trends and patterns;
- repeat incidents;
- incidents involving individual pupils;
- complaints or concerns;
- injury data;
- staff training needs; and
- compliance with statutory guidance.

The Governing Body/Proprietor Body will receive appropriate safeguarding and behaviour information to enable effective oversight of the school's use of restrictive interventions.

Related Policies

This section should be read alongside:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Restrictive Physical Intervention Policy
- SEND Policy
- Health and Safety Policy
- Risk Assessment Policy
- Allegations Against Staff Policy
- Staff Behaviour Policy/Code of Conduct

Legislative and Guidance Framework

The Willows School will operate in accordance with:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Restrictive Interventions, Including the Use of Reasonable Force, in Schools (DfE, 2026)
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Education and Inspections Act 2006
- Lancashire Children's Safeguarding Assurance Partnership procedures.

The welfare, dignity, rights and safety of the child remain paramount. The Willows School is committed to reducing the need for restrictive interventions through proactive support, effective de-escalation, positive relationships and child-centred practice.

6.8 Abuse of Position of Trust

The Willows School recognises that all adults working with children are in positions of trust and authority. Staff, volunteers, governors, trustees, contractors and anyone working on behalf of the school have a responsibility to maintain appropriate professional boundaries at all times and to act in a manner that safeguards and promotes the welfare of children.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the Staff Behaviour Policy (Code of Conduct), the Guidance for Safer Working Practice for Adults who Work with Children and Young People, and relevant legislation, all adults are expected to maintain professional relationships with pupils which are appropriate, transparent and beyond reproach.

The school recognises that a position of trust exists where an adult has responsibility for, influence over, access to, or authority in relation to a child or young person. Children may view staff as trusted professionals and may therefore be particularly vulnerable to grooming, manipulation or exploitation by adults who misuse that position.

Legal Framework

Staff should understand that under the Sexual Offences Act 2003, it is unlawful for a person in a position of trust to engage in sexual activity with a young person under the age of 18 in certain regulated settings, even where the young person is above the age of consent and the relationship appears consensual.

The school also recognises the widening of Position of Trust provisions through subsequent legislation and government reforms designed to strengthen protection for young people in education, care and safeguarding settings.

Any sexual activity, sexual communication, sexualised behaviour or inappropriate relationship between a member of staff and a pupil is likely to constitute:

- a serious safeguarding concern;
- a breach of professional standards;
- potential gross misconduct;
- an abuse of position of trust; and
- potentially a criminal offence.

Professional Boundaries

All adults working in or on behalf of the school must:

- maintain clear and appropriate professional boundaries;
- avoid favouritism;
- avoid over-familiar relationships;
- act as positive role models;
- ensure interactions are transparent and accountable;
- maintain appropriate professional curiosity and safeguarding vigilance;
- avoid behaviours that could be misinterpreted;
- report concerns immediately; and
- comply fully with the Staff Behaviour Policy (Code of Conduct).

Staff must not:

- develop inappropriate personal relationships with pupils;
- communicate with pupils through unauthorised personal accounts or platforms;
- exchange personal contact details with pupils without authorisation;
- engage in flirtatious, sexualised or intimate communication;
- give gifts or special treatment that could create dependency or imbalance;
- use their position to obtain personal, emotional or social benefit; or
- exploit their professional role in any way.

Online Conduct and Social Media

The school recognises that safeguarding responsibilities extend beyond the physical school environment.

Inappropriate conduct can occur:

- online;
- through social media;
- through gaming platforms;
- through messaging applications;
- via personal email accounts;
- through photo or video sharing platforms; or
- through any other digital communication method.

Staff must ensure that their behaviour online reflects the same professional standards expected within school.

All staff are required to comply with the school's:

- Staff Behaviour Policy (Code of Conduct);
- Online Safety Policy;
- Acceptable Use Policy;
- Social Media Policy; and
- Safeguarding and Child Protection Policy.

Staff should be aware that relationships, associations, communications and online activity outside work may raise safeguarding concerns where they:

- indicate a risk to children;
- undermine professional boundaries;
- impact suitability to work with children; or
- bring the school or profession into disrepute.

Reporting Concerns

Any concern regarding:

- inappropriate relationships;
- grooming behaviour;
- boundary violations;
- abuse of position of trust;
- inappropriate communication;
- concerning online conduct; or
- any behaviour that may place a child at risk,

must be reported immediately to the Headteacher, Designated Safeguarding Lead (DSL) or other appropriate safeguarding lead.

Concerns will be managed in accordance with:

- KCSIE 2026 Part Four;
- the Managing Allegations Against Staff Policy;
- the Low-Level Concerns Policy;
- Local Authority Designated Officer (LADO) procedures; and
- local safeguarding partnership guidance.

Where concerns meet the allegation threshold, consultation with the LADO will take place without delay.

Safer Culture and Prevention

The school seeks to prevent abuse of position of trust through:

- robust safer recruitment procedures;
- thorough induction processes;
- safeguarding training;
- regular staff updates;
- a clear Staff Behaviour Policy;
- low-level concerns procedures;
- whistleblowing arrangements;
- professional supervision and oversight; and
- a culture of openness, transparency and accountability.

Related Policies

This section should be read alongside:

- Safeguarding and Child Protection Policy
- Staff Behaviour Policy / Code of Conduct
- Online Safety Policy
- Social Media Policy
- Low-Level Concerns Policy
- Allegations Against Staff Policy
- Whistleblowing Policy
- Safer Recruitment Policy

The Willows School will not tolerate any abuse of a position of trust. All adults working with children are expected to maintain the highest standards of professional conduct and to ensure that the welfare, dignity, safety and best interests of children remain paramount at all times.

6.9 Online Safety and Technology Management

The Willows School recognises that technology is an integral part of children's lives and learning. Whilst the internet, digital technologies and artificial intelligence (AI) provide significant educational and social opportunities, they also create safeguarding risks which require effective management and oversight.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the Department for Education's Filtering and Monitoring Standards for Schools and Colleges, Cyber Security Standards for Schools and Colleges, and the DfE Guidance on Restrictive Interventions, Online Safety

and Generative AI, the school adopts a whole-school approach to online safety that is embedded within safeguarding practice. KCSIE requires online safety to be approached as a whole-school safeguarding issue and places specific responsibilities on governing bodies and proprietors regarding filtering and monitoring systems.

Online Safety and Digital Risk

The school recognises that safeguarding extends beyond the physical environment and includes all aspects of children's online experiences.

Online safety is considered through the framework of the Four Cs:

Content

Exposure to illegal, inappropriate, harmful or misleading material, including:

- pornography;
- violent content;
- racism;
- misogyny;
- sexism;
- anti-Semitism;
- extremist material;
- self-harm content;
- suicide-related content;
- hate speech;
- misinformation;
- disinformation;
- conspiracy theories; and
- AI-generated harmful material.

The school recognises that misinformation, disinformation and conspiracy theories may place children at risk by influencing beliefs, behaviours and decision-making.

- Disinformation refers to the deliberate creation or sharing of false or misleading information.
- Misinformation refers to false information which may be shared regardless of intent.

Contact

Risks arising through interactions with others online, including:

- online grooming;
- child sexual exploitation;
- child criminal exploitation;
- coercion;
- harassment;
- cyberbullying;
- radicalisation;
- financial exploitation;
- adults posing as children; and
- inappropriate online relationships.

Conduct

Risks arising from children's own behaviour online, including:

- cyberbullying;
- abusive behaviour;
- sharing personal information;
- sharing nude or semi-nude images;
- online sexual harassment;
- harmful sexual behaviour;
- uploading inappropriate content;
- misuse of AI tools; and
- participation in harmful online challenges.

Commerce

Risks associated with online financial activity, including:

- gambling;
- scams;
- phishing;
- fraudulent activity;
- in-app purchases;
- financial exploitation;
- cryptocurrency scams; and
- inappropriate advertising.

Where financial scams or phishing attempts are identified, concerns will be reported through appropriate organisational and cyber security channels.

Whole School Online Safety Approach

The Willows School adopts a proactive and proportionate approach to managing online safety.

The school will:

- maintain an Online Safety Policy that is reviewed annually;
- ensure online safety is embedded within safeguarding arrangements;
- teach online safety through the curriculum, including RSHE, PSHE and Computing;
- provide age-appropriate online safety education;
- support parents and carers in understanding digital risks;
- provide guidance regarding emerging technologies and platforms;
- ensure all users sign Acceptable Use Agreements;
- promote safe, responsible and respectful use of technology;
- encourage pupils to report online concerns;
- maintain effective filtering and monitoring systems; and
- respond promptly to online safeguarding concerns.

Online safety education will include:

- healthy online relationships;
- online consent;
- cyberbullying;
- misinformation and disinformation;
- critical thinking;
- online reputation;
- artificial intelligence;
- privacy and security;
- digital resilience;

- harmful content;
- sexual harassment and exploitation online; and
- how to seek help and report concerns.

Artificial Intelligence (AI), Emerging Technologies and Digital Safety

The school recognises the increasing use of artificial intelligence and generative AI tools by children and young people.

Whilst AI presents valuable educational opportunities, it may also create safeguarding risks including:

- exposure to inappropriate content;
- AI-generated sexual imagery;
- deepfakes;
- misinformation and disinformation;
- manipulation;
- impersonation;
- radicalisation content;
- academic misuse;
- cyber security threats; and
- exploitation.

To safeguard pupils, The Willows School will:

- assess the suitability of AI tools before use;
- ensure AI products are age-appropriate;
- implement filtering and monitoring arrangements relating to AI platforms where possible;
- provide staff oversight of AI use;
- educate pupils about responsible and critical use of AI technologies;
- teach children how to identify AI-generated content;
- address risks associated with deepfakes and image manipulation;
- review emerging digital risks regularly; and
- ensure use aligns with safeguarding, privacy and cyber security expectations.

Cyber Security

The school recognises that effective cyber security is a safeguarding responsibility.

The school will work to ensure:

- secure networks and systems;
- appropriate password controls;
- multi-factor authentication where appropriate;
- regular software updates;
- secure management of pupil data;
- staff cyber awareness training;
- vulnerability management;
- secure storage of information; and
- compliance with relevant data protection requirements.

Cyber security arrangements will be reviewed regularly in line with Department for Education standards and emerging threats.

Filtering and Monitoring Systems

In accordance with KCSIE 2026, the school maintains appropriate filtering and monitoring arrangements to safeguard children when accessing digital systems. Governing bodies and proprietors are expected to have effective oversight of these systems and understand both their strengths and limitations.

Filtering

Branches Education Group uses SafetyNet filtering systems across school networks and devices.

The filtering system:

- blocks access to inappropriate content;
- applies age-appropriate filtering categories;
- restricts access to harmful, illegal and unsafe websites;
- supports safeguarding monitoring;
- helps protect pupils from online harms; and
- generates alerts where attempts are made to access blocked content.

Alerts are sent to:

- the Headteacher;
- the Designated Safeguarding Lead (DSL); and
- Deputy DSLs.

Monitoring

Branches Education Group uses SafetyNet monitoring software across school-managed devices.

Monitoring systems:

- identify potential safeguarding concerns;
- monitor behaviour on school devices;
- identify high-risk searches and activity;
- flag safeguarding concerns;
- generate alerts regarding critical or threat-level incidents; and
- support safeguarding investigations where required.

Where alerts are generated, safeguarding staff will assess and respond appropriately.

Roles and Responsibilities

Governing Body / Proprietor Body

The Governing Body and Proprietor Body are responsible for ensuring:

- effective filtering and monitoring systems are in place;
- there is strategic oversight of online safety arrangements;

- systems are reviewed regularly;
- safeguarding and IT leaders work collaboratively;
- online safety is embedded within safeguarding arrangements; and
- **cyber security standards are maintained.**

Headteacher

The Headteacher is responsible for:

- ensuring effective implementation of online safety arrangements;
- overseeing filtering and monitoring systems;
- ensuring staff receive appropriate training;
- responding to serious concerns; and
- supporting safeguarding leaders.

Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- overseeing safeguarding aspects of online safety;
- reviewing alerts generated through monitoring systems;
- responding to concerns appropriately;
- assessing safeguarding risks;
- making referrals where necessary;
- maintaining safeguarding records; and
- liaising with IT colleagues regarding online safety concerns.

IT Support

IT staff support the school by:

- maintaining filtering and monitoring systems;
- responding to technical issues;
- blocking harmful websites;
- supporting cyber security arrangements;
- assisting with investigations where appropriate; and
- advising school leaders regarding online risks.

Where inappropriate content is identified, staff must:

- immediately report concerns to the DSL;
- record the concern;
- notify IT support where website blocking is required; and
- follow safeguarding procedures.

Mobile Phones and Personal Devices

To reduce online safeguarding risks, pupils are not permitted unrestricted access to mobile phones or personal devices during the school day.

Where pupils bring mobile phones onto the school site:

- devices must be handed to staff at the beginning of the day;

- devices will be securely stored;
- access will not normally be permitted during the school day unless authorised;
- devices will be returned at the end of the day.

This approach helps reduce risks associated with:

- cyberbullying;
- online sexual harassment;
- exploitation;
- exposure to harmful content;
- unauthorised filming or photography;
- sharing of nude or semi-nude images;
- access to pornography;
- inappropriate social media use; and
- misuse of artificial intelligence applications.

Reporting Concerns

Any online safety concern must be reported immediately to the DSL or Deputy DSL.

Concerns may include:

- online abuse;
- cyberbullying;
- online grooming;
- exploitation;
- harmful content;
- radicalisation;
- sharing of images;
- AI-related abuse;
- misinformation or disinformation concerns;
- inappropriate online contact; or
- any behaviour that places a child at risk.

All concerns will be recorded and managed in accordance with safeguarding procedures.

Relevant Guidance

This section should be read alongside:

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Behaviour Policy
- Acceptable Use Policy
- Staff Code of Conduct
- Child-on-Child Abuse Policy
- Mobile Phone Policy
- Data Protection Policy

The school will operate in accordance with:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Filtering and Monitoring Standards for Schools and Colleges
- Cyber Security Standards for Schools and Colleges
- Department for Education Guidance on Generative AI
- UK Safer Internet Centre Guidance
- Local Safeguarding Partnership procedures.

The Willows School recognises that online safety is a safeguarding issue. The school is committed to creating a safe digital environment where pupils can access the benefits of technology while being protected from harm, abuse, exploitation and emerging online risks.

6.10 Cybercrime

The Willows School recognises that cybercrime is an emerging safeguarding risk and that some children may be vulnerable to becoming involved in unlawful online activity, either knowingly or unknowingly. In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the school's Online Safety Policy, and national cyber security guidance, staff will remain alert to indicators that a child may be involved in, at risk of involvement in, or a victim of cybercrime.

Cybercrime refers to criminal activity committed using computers, digital devices, networks or the internet and is generally categorised as either:

- Cyber-enabled crime, where technology is used to facilitate offences that can also occur offline; or
- Cyber-dependent crime, where the offence can only be committed through the use of computers, digital networks or internet-enabled technology.

The school recognises that children with advanced technical skills, strong interests in computing, gaming, coding, programming or cyber security may, on occasion, inadvertently or deliberately become involved in cybercrime. Early identification and intervention can help redirect these interests into positive and lawful opportunities.

Cyber-Dependent Crime

Examples of cyber-dependent crime include:

- unauthorised access to computer systems or networks ("hacking");
- attempting to access, alter or delete data without permission;
- accessing school systems to obtain confidential information, examination materials or assessment information;
- changing grades, records or other data without authorisation;
- Denial of Service (DoS) or Distributed Denial of Service (DDoS) attacks;
- "booting" attacks designed to disrupt access to online services;
- creating, obtaining, distributing or using malware;
- ransomware attacks;
- spyware;
- viruses;
- botnets;
- Remote Access Trojans (RATs);
- credential theft;
- password attacks; and
- other activities intended to compromise systems, data or networks.

Cyber-Enabled Crime

The school recognises that cyber-enabled offences may also pose safeguarding concerns and may include:

- fraud and online scams;
- phishing attacks;
- identity theft;
- financial exploitation;
- online harassment;
- cyberbullying;
- online hate crime;
- sharing illegal content;
- child sexual abuse and exploitation offences;
- distribution of harmful material;
- image-based abuse;
- online blackmail or sextortion; and
- the misuse of artificial intelligence technologies to facilitate harm.

Artificial Intelligence and Emerging Technologies

The Willows School recognises that emerging technologies, including artificial intelligence (AI), may increase opportunities for cybercrime and online harm.

Examples may include:

- AI-assisted phishing attacks;
- automated social engineering;
- creation of malicious code;
- deepfake content;
- identity impersonation;
- unauthorised system access;
- generation of harmful content; and
- cyber-enabled fraud.

Staff will remain alert to the evolving nature of cyber threats and will ensure that pupils receive appropriate education regarding responsible, ethical and lawful use of technology.

Indicators of Potential Cybercrime Involvement

Staff should be alert to indicators that may suggest a child is involved in or vulnerable to cybercrime, including:

- unexplained possession of multiple devices;
- use of unfamiliar software designed to conceal activity;
- discussion of hacking tools or techniques;
- attempts to bypass school filtering or monitoring systems;
- accessing restricted systems without permission;
- unusual technical knowledge inconsistent with age and context;
- excessive secrecy regarding online activity;
- involvement in online forums associated with cyber offending;
- downloading hacking tools or malware;
- interest in disrupting networks or systems; or
- disclosures from pupils, parents or professionals.

These indicators do not automatically signify criminal activity and should be considered within the wider context of the child's circumstances, interests and behaviour.

Responding to Concerns

Where staff have concerns that a child may be involved in cybercrime, they must:

- report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL;
- record concerns on the school's safeguarding system;
- preserve relevant information where appropriate;
- avoid conducting their own investigation; and
- follow safeguarding procedures.

The DSL will consider:

- the child's age and understanding;
- the nature of the activity;
- motivation and intent;
- safeguarding vulnerabilities;
- whether the child may be being exploited or influenced by others;
- risks to other children, staff or systems;
- any criminal implications; and
- the need for specialist advice or referral.

Cyber Choices Programme

Where appropriate, the DSL may consider referral to the Cyber Choices Programme, a national Police-led initiative supported by the Home Office and National Crime Agency (NCA).

The programme aims to:

- identify young people at risk of engaging in cyber-dependent crime;
- provide early intervention;
- educate children regarding legal and ethical technology use;
- redirect technical skills into positive opportunities; and
- reduce the risk of future offending.

The Cyber Choices Programme primarily supports young people involved in or at risk of involvement in lower-level cyber-dependent offences and does not ordinarily manage wider online safeguarding issues such as cyberbullying, child sexual exploitation or online abuse.

Safeguarding and Prevention

The school seeks to prevent involvement in cybercrime by:

- delivering online safety education through the curriculum;
- teaching responsible and ethical use of technology;
- promoting digital citizenship;
- supporting cyber security awareness;
- maintaining effective filtering and monitoring systems;
- challenging unsafe online behaviours;
- educating pupils about cybercrime legislation and consequences;
- identifying risks at an early stage; and
- working with parents, carers and external agencies.

Multi-Agency Working

Where concerns arise, the school may work with:

- Police;
- Children's Social Care;
- the National Crime Agency;
- Cyber Choices professionals;
- local safeguarding partners;
- cyber security specialists;
- Family Help Services; and
- other relevant agencies.

Further Support and Guidance

Further information and resources are available from:

- National Crime Agency (NCA) Cyber Choices
- National Cyber Security Centre (NCSC)
- CEOP Education (Thinkuknow)
- Education for a Connected World
- UK Safer Internet Centre
- Harmful Online Challenges and Online Hoaxes Guidance
- Department for Education Online Safety Guidance

Local Procedures

Where concerns relate to cybercrime, online safety or technology-related safeguarding risks, The Willows School will follow:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- National Cyber Security Centre guidance
- National Crime Agency Cyber Choices guidance
- Lancashire Children's Safeguarding Assurance Partnership procedures
- Local online safety and safeguarding procedures.

The welfare, safety and best interests of the child remain paramount. The Willows School recognises that many children involved in cyber-related incidents may themselves be vulnerable and will adopt a safeguarding-led, educational and proportionate response aimed at protecting children and promoting positive outcomes.

6.11 Education at home, Remote Learning and Online Learning Outside School

The Willows School recognises that there may be occasions when pupils access learning, research activities, educational platforms or remote education from home or another off-site location. The school acknowledges that safeguarding responsibilities apply equally when education is delivered remotely or where pupils are undertaking work online outside the school environment.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, the school's Online Safety Policy and Department for Education guidance on remote education and online safety, the school will take reasonable steps to safeguard pupils participating in remote and online learning activities.

The school recognises that remote education can present additional safeguarding risks, including:

- exposure to inappropriate or harmful content;
- online grooming;
- cyberbullying;
- online exploitation;
- excessive screen time;
- harmful online challenges;
- misinformation and disinformation;
- inappropriate contact from adults or peers;
- privacy risks;
- unauthorised recording of lessons or interactions;
- misuse of artificial intelligence (AI) tools; and
- sharing of personal information.

Safeguarding During Remote and Online Learning

When pupils are asked to complete learning activities online, the school will:

- provide learning through approved and risk-assessed platforms wherever possible;
- ensure staff understand safeguarding expectations when delivering remote education;
- use school-approved communication methods;
- maintain professional boundaries at all times;
- monitor engagement and welfare concerns where appropriate;
- ensure online learning activities are suitable for the age and needs of pupils;
- follow the Staff Behaviour Policy (Code of Conduct); and
- adhere to the Online Safety Policy and Acceptable Use Agreements.

Working with Parents and Carers

Where online learning activities are set, the school will ensure that parents and carers are informed about:

- the purpose of the activity;
- any online platforms, websites or applications being used;
- expectations regarding safe online behaviour;
- who pupils may interact with online as part of school activities;
- how concerns can be reported; and
- available online safety guidance and support.

The school will work collaboratively with parents and carers to support safe and responsible use of technology outside school.

Online Safety Education

The school will proactively teach children how to stay safe online through the curriculum and pastoral support.

This includes learning about:

- healthy online relationships;
- online consent;
- cyberbullying;
- privacy and security;
- misinformation and disinformation;
- online scams and phishing;

- artificial intelligence and digital literacy;
- online exploitation;
- harmful content;
- digital footprints;
- responsible social media use; and
- how to seek help and report concerns.

Pupils will be encouraged to speak to a trusted adult if they are worried about anything they see, hear or experience online.

Responding to Concerns

Any safeguarding concerns arising during remote education or online learning activities must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL and managed in accordance with the Safeguarding and Child Protection Policy, Online Safety Policy and local safeguarding procedures.

Where concerns relate to online abuse, exploitation or harmful content, the school will follow local safeguarding partnership procedures and seek support from relevant agencies where required.

6.12 Alternative Provision (AP)

The Willows School recognises that placing a pupil in alternative provision does not reduce or transfer the school's safeguarding responsibilities. The school remains responsible for the safeguarding, welfare and educational outcomes of pupils placed in alternative provision.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, the school will undertake appropriate checks and maintain effective oversight of all alternative provision arrangements.

Before Placement

Prior to any placement, the school will:

- undertake due diligence regarding the provider;
- obtain written confirmation of safeguarding arrangements;
- verify safer recruitment procedures;
- obtain written confirmation that appropriate DBS and vetting checks have been completed for relevant staff;
- ensure safeguarding policies and procedures are in place;
- assess the suitability of the provision to meet the child's needs;
- identify any safeguarding risks associated with the placement; and
- ensure clear contractual arrangements are established.

The school will maintain records of:

- the provider's address;
- contact details;
- safeguarding leads;
- details of any subcontracted or satellite provision;
- attendance arrangements; and
- safeguarding information relevant to the placement.

Monitoring and Oversight

The school will maintain regular oversight of all alternative provision placements.

This may include:

- review meetings;
- safeguarding discussions;
- attendance monitoring;
- progress reviews;
- welfare checks;
- visits to the provision;
- liaison with staff and safeguarding leads; and
- discussions with pupils and families.

The frequency of visits and reviews will be proportionate to:

- the needs of the pupil;
- the nature of the placement;
- identified safeguarding risks; and
- professional judgement.

Safeguarding Concerns

Any safeguarding concerns identified within alternative provision will be:

- reported immediately;
- recorded appropriately;
- shared with relevant professionals;
- investigated in accordance with safeguarding procedures; and
- subject to ongoing review.

Where concerns indicate that a placement is no longer safe or suitable, the school will review the placement immediately and take appropriate action, which may include ending the placement.

6.13 Helping Children and Young People to Keep Themselves Safe

The Willows School is committed to empowering children and young people to recognise, understand and manage risk in age-appropriate ways.

The school recognises that safeguarding is strengthened when children are equipped with the knowledge, confidence and skills needed to:

- keep themselves safe;
- make informed decisions;
- recognise risk;
- understand healthy relationships;
- seek support when required; and
- report concerns.

Curriculum and Pastoral Support

Opportunities to develop safeguarding awareness are embedded throughout:

- PSHE education;
- RSHE;
- Computing;
- Online Safety education;
- assemblies;
- pastoral programmes;
- therapeutic support; and
- everyday interactions with staff.

Children are taught about:

- personal safety;
- healthy and unhealthy relationships;
- consent;
- boundaries;
- online safety;
- bullying and cyberbullying;
- exploitation;
- grooming;
- mental health and emotional wellbeing;
- discrimination and equality;
- radicalisation and extremism;
- substance misuse;
- risky behaviours; and
- how and where to access help.

Promoting Protective Behaviours

The school's approach is designed to be empowering rather than fear-based.

Staff will support children to:

- recognise situations that may place them at risk;
- develop resilience and self-confidence;
- understand protective behaviours;
- identify trusted adults;
- understand their rights;
- make safer choices; and
- develop strategies for managing challenges and worries.

Pupil Voice and Help-Seeking

The Willows School promotes an open and supportive culture in which children are encouraged to speak out about worries, concerns or experiences.

Children are regularly reminded that:

- they will be listened to;
- concerns will be taken seriously;
- support is available;
- there are multiple trusted adults within school;
- seeking help is a strength; and
- safeguarding is everyone's responsibility.

The school is committed to fostering an environment of respect, trust, inclusion and safety where every child feels valued, heard and protected.

Related Policies

This section should be read alongside:

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Behaviour Policy
- Attendance Policy
- RSHE Policy
- PSHE Policy
- SEND Policy
- Alternative Provision Procedures
- Staff Behaviour Policy / Code of Conduct

The welfare, safety and best interests of children remain paramount. The Willows School is committed to ensuring that all pupils, whether educated on-site, remotely or through alternative provision, are safeguarded effectively and supported to develop the skills, knowledge and confidence needed to stay safe throughout their lives.

7.0 References and Key Guidance Documents

The Willows School operates its safeguarding arrangements in accordance with current legislation, statutory guidance, local safeguarding partnership procedures and best practice.

The following documents should be read alongside this Safeguarding and Child Protection Policy:

Statutory Guidance

- Department for Education (DfE) (2026) Keeping Children Safe in Education (KCSIE 2026)
- Department for Education (DfE) (2026) Working Together to Safeguard Children
- Department for Education (DfE) (Latest Edition) Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- Department for Education (DfE) Working Together to Improve School Attendance (Statutory Guidance)
- Department for Education (DfE) Children Missing Education: Statutory Guidance for Local Authorities
- Department for Education (DfE) Searching, Screening and Confiscation: Advice for Schools
- Department for Education (DfE) (2026) Restrictive Interventions, Including the Use of Reasonable Force, in Schools
- Department for Education (DfE) Sexual Violence and Sexual Harassment Between Children in Schools and Colleges
- Department for Education (DfE) Mental Health and Behaviour in Schools
- Department for Education (DfE) Teaching Online Safety in Schools
- Department for Education (DfE) The Prevent Duty Guidance: England and Wales
- Department for Education (DfE) Promoting the Education of Children with a Social Worker and Children in Kinship Care Arrangements

Online Safety and Digital Safeguarding

- UK Council for Internet Safety (UKCIS) Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People
- Department for Education (DfE) Meeting Digital and Technology Standards in Schools and Colleges
- Department for Education (DfE) Filtering and Monitoring Standards for Schools and Colleges
- Department for Education (DfE) Plan Technology for Your School
- Department for Education (DfE) Generative AI: Product Safety Expectations
- Department for Education (DfE) Guidance for Applying Filtering and Monitoring Standards to AI Tools
- National Cyber Security Centre (NCSC) Guidance
- Education for a Connected World Framework
- UK Safer Internet Centre Guidance and Resources
- CEOP Education (Thinkuknow)
- Childnet International Resources
- Harmful Online Challenges and Online Hoaxes Guidance

Child Protection and Safeguarding Practice

- Department for Education (DfE) (2015) What to Do if You Are Worried a Child is Being Abused: Advice for Practitioners
- Department for Education (DfE) (2017) Child Sexual Exploitation: Definition and Guide for Practitioners
- HM Government Multi-Agency Statutory Guidance on Female Genital Mutilation
- Home Office Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance
- Home Office Modern Slavery Statutory Guidance
- Working Together to Safeguard Children Practice Reviews and National Learning Reviews

Safer Recruitment and Professional Conduct

- Safer Recruitment Consortium (Latest Edition) Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings
- Department for Education (DfE) Teachers' Standards
- Department for Education (DfE) Teacher Misconduct: Guidance for Employers
- Disclosure and Barring Service (DBS) Guidance
- Teaching Regulation Agency (TRA) Guidance

Equality, Inclusion and SEND

- SEND Code of Practice: 0-25 Years
- Equality Act 2010
- Human Rights Act 1998
- NSPCC Guidance: Safeguarding d/Deaf and Disabled Children and Young People

Legislation

This policy is underpinned by, but not limited to, the following legislation:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Inspections Act 2006
- Education Act 2011
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012
- Counter-Terrorism and Security Act 2015
- Serious Crime Act 2015
- Modern Slavery Act 2015
- Crime and Disorder Act 1998
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Sexual Offences Act 2003
- Human Rights Act 1998

Local Safeguarding Arrangements

The Willows School will also follow:

- Lancashire Children's Safeguarding Assurance Partnership (CSAP) Procedures
- Lancashire Continuum of Need and Response Framework
- Lancashire Child Exploitation Guidance and Screening Tool
- Lancashire Missing from Home and Care Protocols
- Lancashire Domestic Abuse Procedures
- Lancashire Online Safety Procedures
- Lancashire Child-on-Child Abuse Procedures
- Lancashire Prevent Partnership Guidance
- Channel Referral Procedures
- Local Authority Designated Officer (LADO) Procedures
- Operation Encompass Guidance
-

School Policies to be Read Alongside this Policy

- Behaviour Policy
- Staff Behaviour Policy / Code of Conduct
- Online Safety Policy
- Anti-Bullying Policy
- Attendance Policy
- SEND Policy
- Equality and Inclusion Policy
- Health and Safety Policy
- Restrictive Physical Intervention Policy
- Whistleblowing Policy
- Low-Level Concerns Policy
- Allegations Against Staff Policy
- Safer Recruitment Policy
- Mobile Phone Policy
- Acceptable Use Policy
- Relationships, Sex and Health Education (RSHE) Policy
- Mental Health and Wellbeing Policy

This policy will be reviewed annually, or sooner where changes in legislation, statutory guidance, local safeguarding arrangements or emerging safeguarding risks require amendment.

8.0 APPENDICES

Appendix 1 – Safeguarding Recording Form - CPOMS

Appendix 2 – Body Map Guidance and Templates

Appendix 3 – Quick Links to online manual/ portal: Lancashire Children's Safeguarding Assurance Partnership

Appendix 4 – Listening and Recording

Appendix 5 – Definitions of Child Abuse, Neglect and Exploitation

Appendix 6 – Indicators of Child Abuse, Neglect and Exploitation

Appendix 1 – Safeguarding Recording Form – CPOMS

The Willows

+ Add Incident

:

Hide Names

Blank Screen

Back

Student

Incident

Categories

Linked student(s)

Maps

Date/Time

Status

Assign to

Files

Alert Staff Members

Agency Involved

Begin typing a student's name

☐ Attendance

☐ Behaviour

☐ Cause for Concern

☐ Child Protection

☐ Contact with External Agency

☐ Contact with Parents

☐ Friendship Related Issues

☐ Medical

☐ Mental Health and Wellbeing

☐ Peer on Peer

☐ Safeguarding Concern

☐ SEND

☐ Sexual Harassment

Begin typing a student's name

Type a student's name to link them to this incident.

21/11/2024 12:04

Active

Monitoring will end if you select 'No Further Action'

Begin typing a staff member's name

Click to browse or drag a file to upload

Begin typing a staff member's name

All Staff

Type a colleague's name or select an alert group to alert them to this incident. Colleagues highlighted in red would not normally be able to view this incident.

Submit Incident

Appendix 2 - Body Map Guidance and Templates

Body Maps should be used to document all signs of harm and physical injuries.

Use a black pen. Do not use correction fluid or other type of eraser.

Record the date and time of the observations. State your name and role.

Do not remove the child's clothing for the purposes of examination, unless the injury site is already visible due to being treated by a First Aider/ responder.

- **Never take photographs** as evidence of any injuries or marks to a child.
- **Use the Body Map forms** below.
- **All concerns should be reported to the DSL and recorded without delay.**
- **The DSL will contact appropriate safeguarding services**, e.g. Social Care direct or child's Social Worker if already an open case to social care.

When you notice an injury to a child, record the information below for every mark you see, e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns.

Give detail about:

- exact site of injury on the body, e.g. upper outer arm/ left cheek;
- size of injury - in centimetres or inches;
- shape of injury, e.g. round/ square/ straight line;
- colour of injury - if more than one colour, say so.
- any broken skin?
- any swelling at the site of the injury, or elsewhere?
- any scab/ blistering/ bleeding?
- if the injury is clean or if there is dirt/ grit/ fluff etc.
- any restricted mobility due to the injury
- whether the site of the injury feels hot
- if the child feels hot
- if the child is in pain
- if the child's body shape has changed/ are they holding themselves differently?

Add any further information as required.

Ensure First Aid is provided where required and record this.

Complete an Accident Form as appropriate.

A copy of the body map should be given to the DSL/ kept on the child's safeguarding/ confidential file.

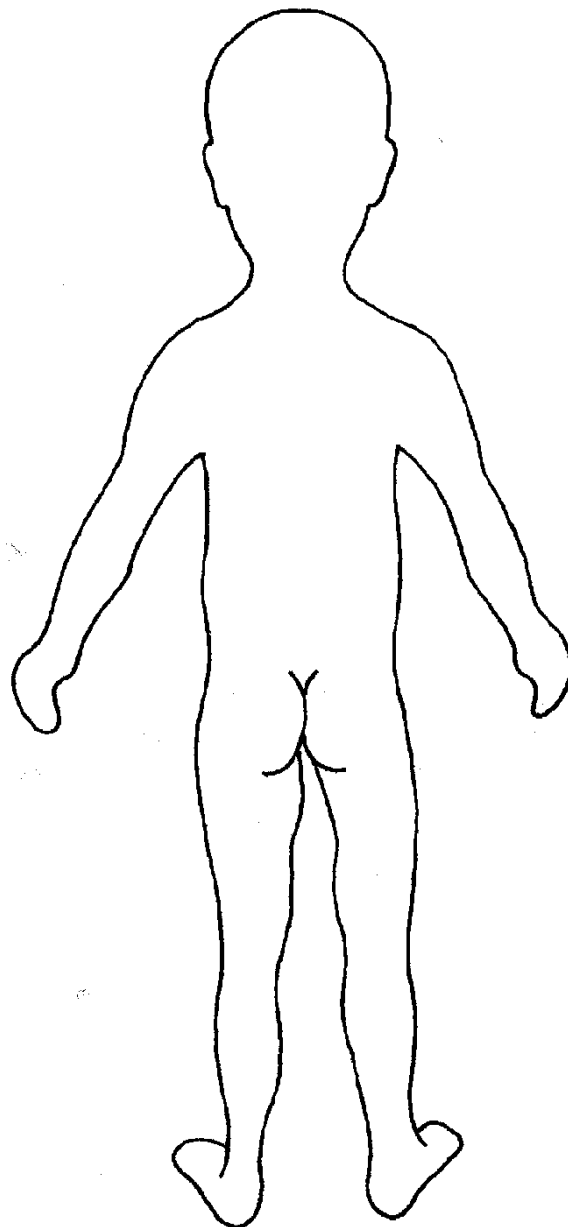
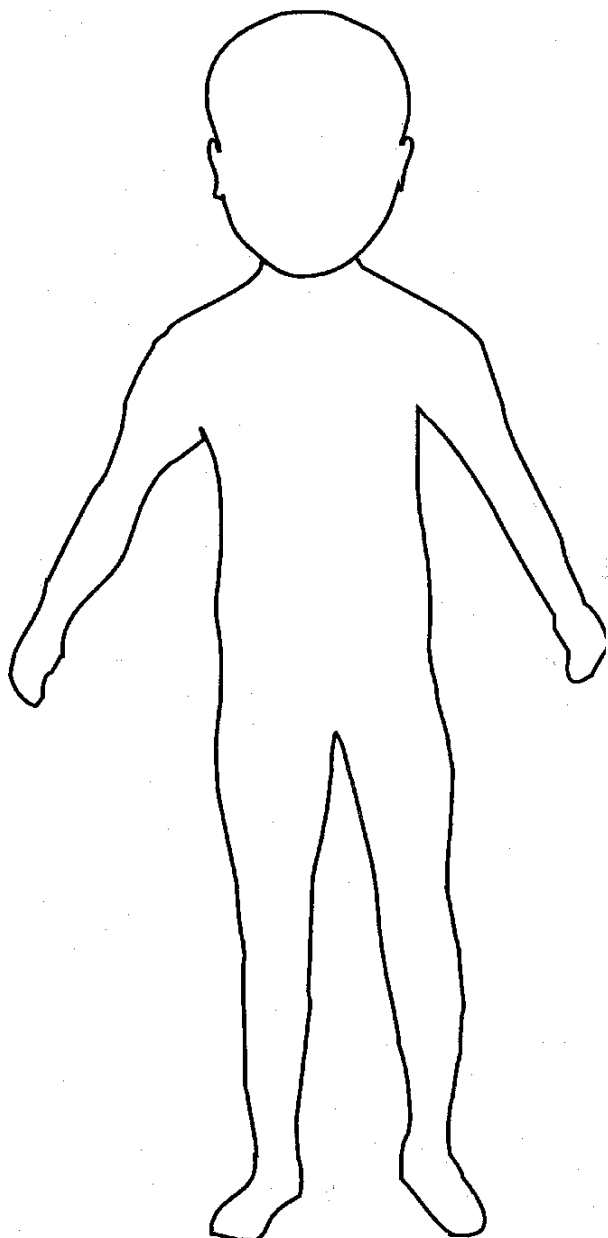
BODY MAP 1- Full body

(This must be completed at time of observation)

Name of Pupil: _____ Date of Birth: _____

Name of Staff: _____ Job title: _____

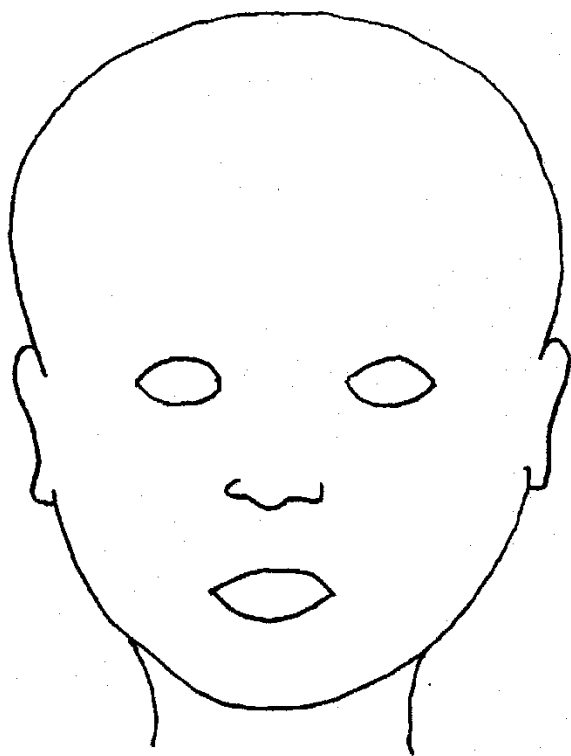
Date and time of observation: _____



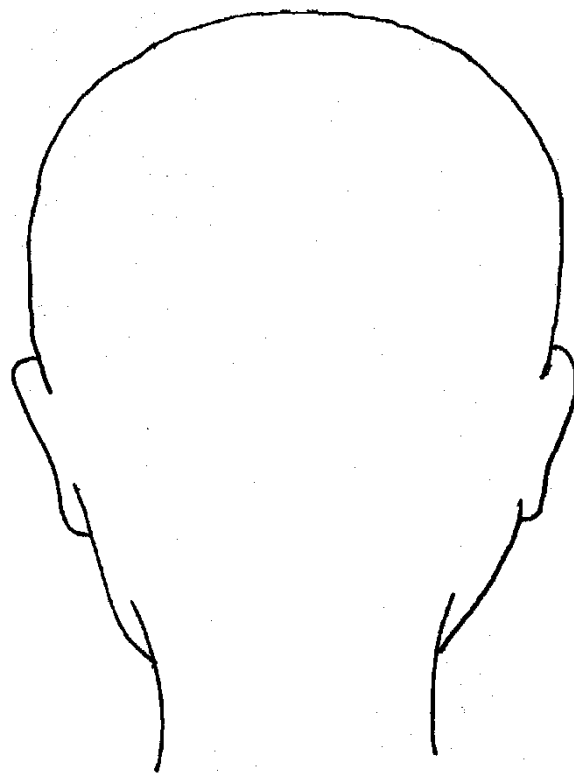
BODY MAP 2 – Face and Head

Name of pupil:

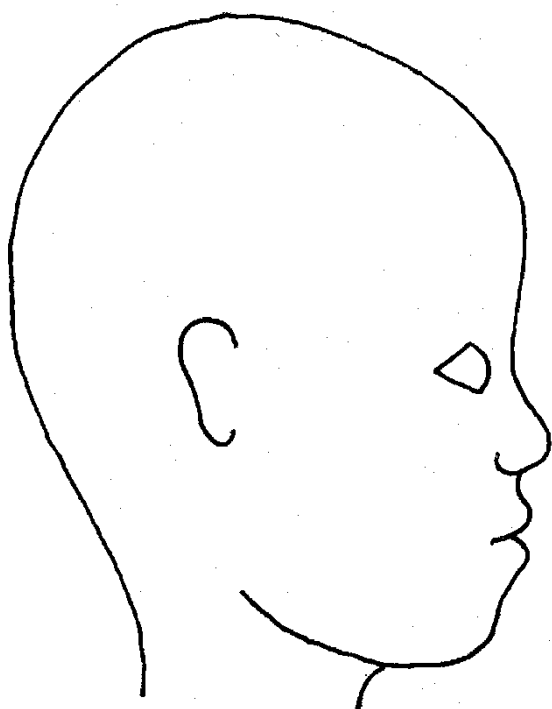
Date and time of observation:



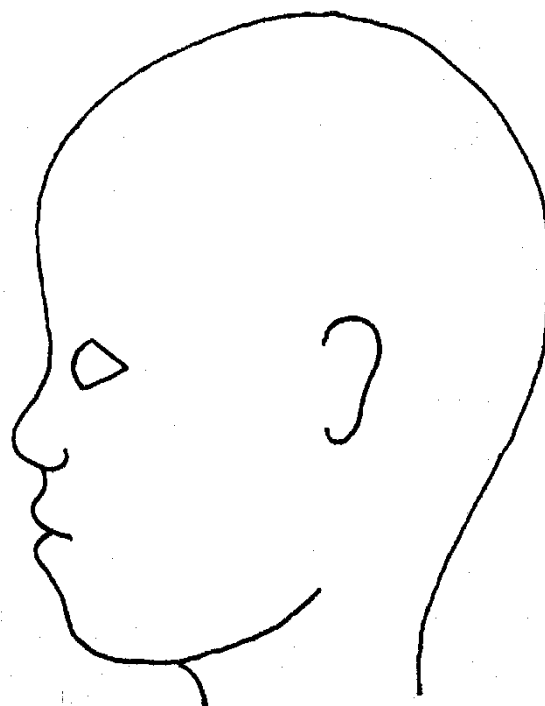
FRONT



BACK



RIGHT

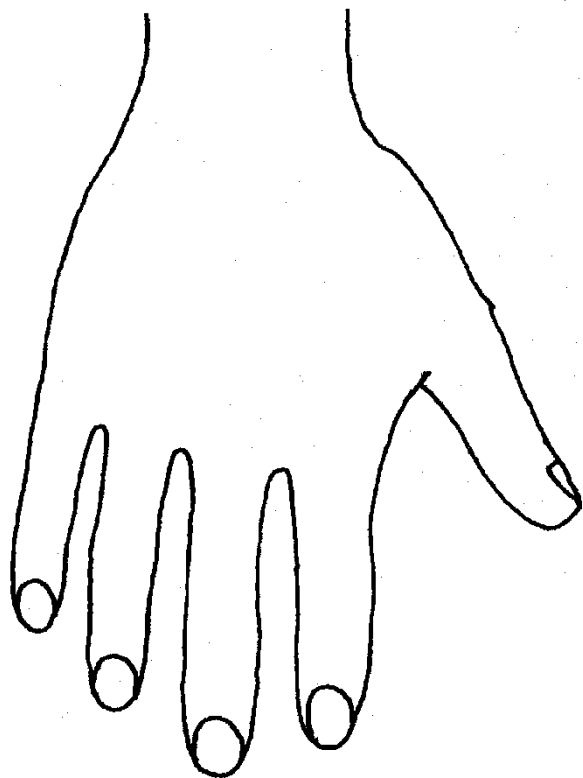


LEFT

BODY MAP 3 – Hands

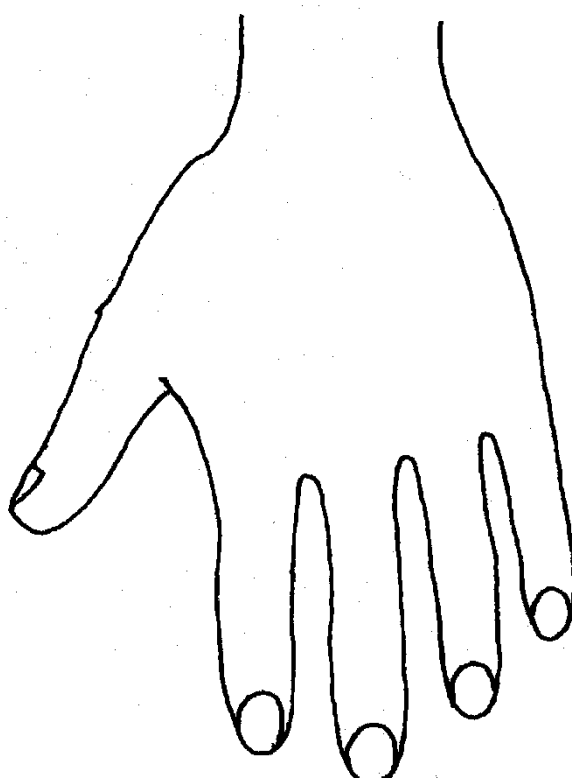
Name of pupil: _____

Date and time of
observation: _____

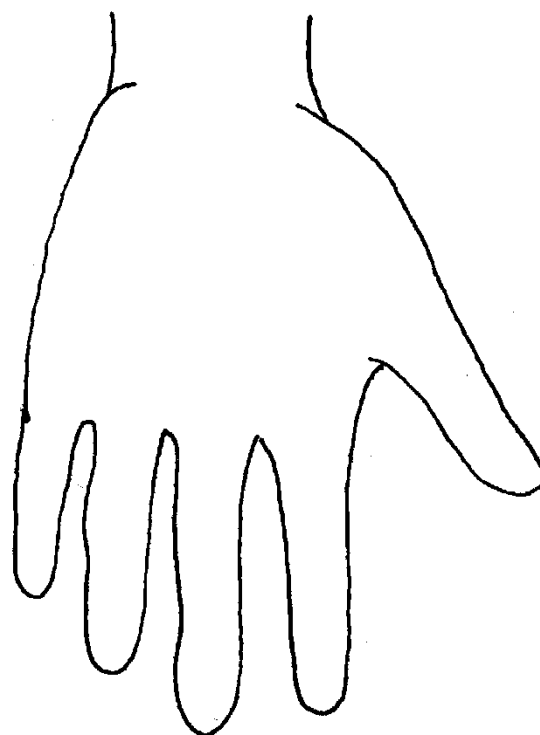
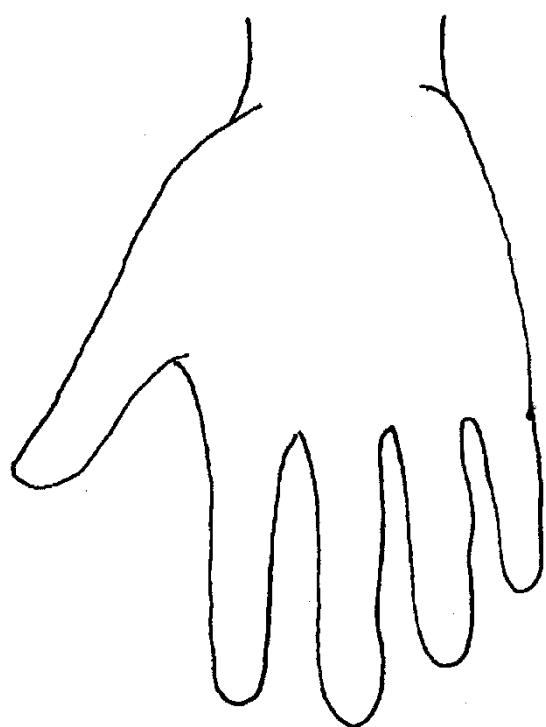


R

BACK



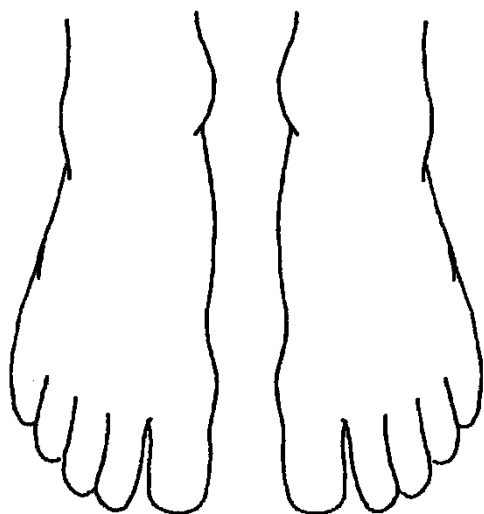
L



BODY MAP 4 – Feet

Name of pupil: _____

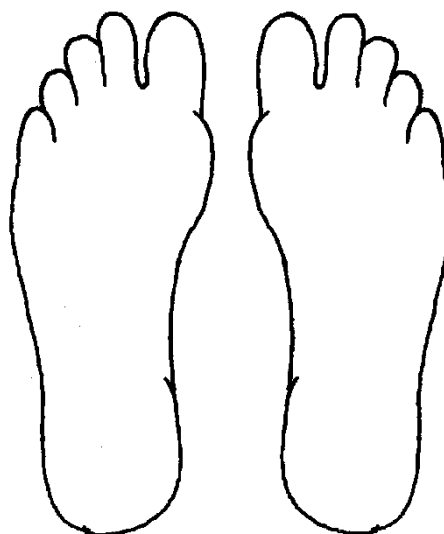
Date and time of
observation: _____



R

TOP

L



R

BOTTOM

L



R

INNER

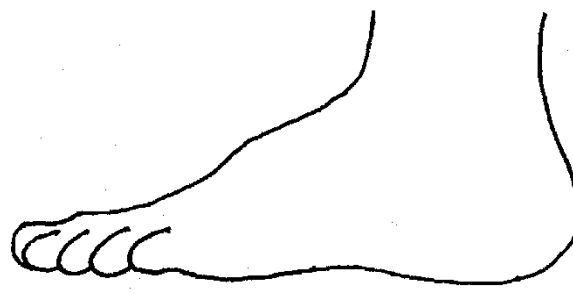


L



R

OUTER



L

Printed Name, Signature and
Job title of staff: _____

Appendix 3 – QUICK LINKS

Lancashire, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (CSAP) Procedures Manual 2024

<https://panlancashirescb.proceduresonline.com/chapters/contents.html>

Quick Links:

This contents list is sub divided into the following sections, each Section contains relevant Chapters/Procedures: (Click on the title to jump to the Section you require):

1. [Policy Framework](#)

The Lancashire, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (CSAP)

2. [Managing Individual Cases where there are Concerns about a Child's Safety and Welfare](#)
3. [Managing Individual Cases where there are Concerns about a Child's Safety and Welfare - Flowcharts](#)
4. [Children in Specific Circumstances](#)
5. [Safe Workforce](#)
6. [Individuals who Pose a Risk to Children](#)
7. [Professional Disagreements](#)
8. [Child Death](#)
9. [Child Safeguarding Practice Reviews](#)
10. [Regional Protocols](#)
11. [Local Protocols](#)
12. [Appendices](#)

<https://panlancashirescb.proceduresonline.com/chapters/contents.html>

Appendix 4 – Listening and Recording

This Listening and Recording table provides staff with guidance on how to respond and listen to a child who is worried, or who has something difficult to say.

Listening	Recording
1. Do not make [false] promises to the child about confidentiality or keeping 'secrets' 2. You have no investigative role. Do not engage in 'interviewing' children or 'investigating' possible or suspected abuse. 3. Listen! Keep calm and don't interrupt. Remember to leave at least five seconds / space for children to think and respond 4. If you <i>have</i> to <i>clarify</i> information then ask only open questions wherever possible. This should be using the TED (Tell me, Explain, Describe) 5. Focus on, pick-out and record the facts i.e. who, what, when, where? Don't get embroiled in 'how' or 'why'? 6. Don't judge or react! Avoid displays of shock and keep opinions to yourself as these things may act as barriers to a child who has something sensitive to tell you. 7. 'When was the last time this happened' is an important thing to ascertain. 8. Reassure the child and make clear to them what you need to do now. 9. Reflect back – key points to enable the child to put right any misunderstandings 10. Ascertain the wishes and feelings of the child in any action to be taken 11. Name – the DSL/DDSL that you are going to report it to, it's important that the child knows who it is that you are passing the information on to	1. It is not advisable to try and complete a full record of the dialogue whilst trying to listen actively and attentively. However, it is a good idea to jot down any key phrases, dates, times etc. as soon as possible 2. Records that are handwritten should be succinct, legible, accurate, timed, signed and dated 3. Records should differentiate clearly between fact, opinion, interpretation etc. Ideally, stick to the facts as you understand them and leave it to the investigative agencies to test the hypotheses 4. If children or adults are being quoted then they must be quoted verbatim. In particular, avoid using other words or adult 'equivalents' for words that children use 5. It is important to record any questions or prompts asked i.e. to show that these were not 'leading' 6. The emotional context of the dialogue is important i.e. did the child become distressed at any point or, alternatively, did they speak matter-of-factly about quite distressing things 7. Any repetition is important to note i.e. things that the child repeats – these may be particularly significant. Similarly, gestures are important to describe accurately e.g. which hand / which cheek, open /closed

Appendix 5 – Definitions of abuse, neglect and exploitation

The definition of ‘abuse’ has been changed to clarify that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects (KCSiE 2024).

Sexual abuse involves: - Forcing or enticing, a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve: - Physical contact including assault by penetration (for example, rape or oral sex); - Non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing - They may also include non-contact activities such as: - Involving children in looking at, or in the production of sexual images; - Watching sexual activities; - Encouraging children to behave in sexually inappropriate ways; - Grooming a child in preparation for abuse. - Sexual abuse can take place online, and technology can be used to facilitate off line abuse. - Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	Emotional abuse is: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. May involve: - conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person; - not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate; - age or developmentally inappropriate expectations being imposed on children (These may include interactions that are beyond the child’s developmental capability, as well as over-protection and limitation of exploration and learning, or preventing the child participating in normal social interaction); - seeing or hearing the ill-treatment of another; - serious bullying (including cyber-bullying), - Causing children frequently to feel frightened or in danger; - The exploitation or corruption of children. - Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
Physical abuse may involve: - Hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. - Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Perplexing Presentations/Fabricated Illness - The carer does not physically harm the child but reports a clinical story, which is fabricated. This is frequently ‘supported’ by false specimens e.g. use of menstrual or animal blood; Induced Illness - The carer inflicts harm on the child e.g. poisoning, suffocation, tearing etc.	Neglect is : The persistent failure to meet a child’s basic physical and/or psychological needs likely to result in the serious impairment of the child’s health or development; - Neglect may occur during pregnancy as a result of maternal substance 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 inadequate care-givers); - Ensure access to appropriate medical care or treatment. - It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Appendix 6 – Indicators of Abuse, Neglect and Exploitation

Neglect	Emotional Abuse	Physical Abuse	Sexual Abuse
Tired/listless	Failure to thrive	Unexplained injuries	Age inappropriate sexual behaviour/knowledge/promiscuity
Unkempt	Attention seeking	Injuries on certain parts of the body	
Poor hygiene	Over ready to relate to others	Injuries in various stages of healing	Wary of adults/running away from home
Untreated medical conditions	Low self esteem	Injuries that reflect an article used	Eating disorders/depression/self-harm
Medical appointments missed	Apathy	Flinching when approached	Unexplained gifts/money
Constantly hungry or stealing food	Depression/self-harm Drink/drug/solvent abuse	Reluctant to change	Stomach pains when walking or sitting
Over eats when food is available	Persistently being over protective	Crying/ instability	Bedwetting
Poor growth	Constantly shouting at, threatening or demeaning a child	Afraid of home	Recurrent genital discharge / infections
Poor/late attendance	Withholding love and affection	Behavioural extremes	Sexually transmitted diseases
Being regularly left alone or unsupervised	Regularly humiliating a child	Apathy/depression	
Dressed inappropriately for the weather condition		Wanting arms and legs covered even in very hot weather	
Having few friends and/or being withdrawn			

Appendix 7 – Incident Report Form

OH Incident Report Form

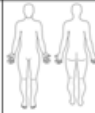
Details	
Pupil:	
Date of incident:	
Time of incident:	
Length of incident:	
Staff involved and/or present:	
Behaviours presented:	
Other:	
Severity of incident:	

1

Description of incident	
Brief details	
- Incident build up - Incident - End of the incident	
Triggers identified:	

Physical intervention	
Type of hold	
Length of restraint	

People informed	Method	Date and time
Head of Education		
Head teacher		
SEN		
Class teacher		
Parents/family		
Emergency services		

Follow Up	
Any injuries?	
Body Map	
	
Details of injury	
Medical assistance been offered?	

Debrief (CORING approach)	
Control (Professional judgement made by Key Adult)	
- Is the pupil under control of their emotions and reactions? - Are they ready to talk about the incident? - If so, they are ready to talk. This can take minutes, hours	
Orient (Key Adult)	
Ask them what happened from their point of view, do not provide your input, this is their time to talk.	
Patterns (Senior/Pastoral lead)	
- Review previous Risk Management Plans, Arson, One Page Profiles and log this incident. - Are there triggers? Signs? Same behaviour in same situations?	
Investigate (Senior/Pastoral lead)	
- What are trends and patterns? - Investigate other alternatives for behaviour	
Negotiate (Key Adult)	
- Go through the school's values, and ethics (word, hands, words and feet) verbal or written. - Determine appropriate approaches for behaviour. - Make agreements about future responses.	
Close	
Give support to the pupil – "I know you can do this" and "we want you to be here"	

Actions	
Risk Management Plans updated:	
One Page Profile Updated:	
Other:	

Headteacher's Evaluation	
Reviewed by:	
Signature:	
Date:	