# The Willows School Academy Trust




# Child Protection

# and

# Safeguarding Policy

Reviewed: September 2026
Next Review: September 2027 (or sooner if required)

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# Introduction

## Aims

The school aims to ensure that:

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

## Child Protection and Safeguarding Policy

The Willows School Academy Trust fully recognises its statutory responsibilities for Child Protection and Safeguarding. It is committed to promoting the welfare of children and young people and expect all staff and volunteers to share this commitment and be appropriately trained.

## School Designated Safeguarding Lead (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) who works alongside the senior leadership team in accordance with KCSIE 2026
The DSL (under the Headteacher) is responsible for matters relating to child protection and welfare in this school:



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| **Name: K. Trzaska** |
| **Title: Designated Safeguarding Lead and Attendance Lead** |
| **Contact: 0208 841 7176** |

In their absence, these matters will be dealt with by the **Deputy DSLs** below:







| | | | | |
|---|---|---|---|---|
| **Name: M. Shaw** | **Name: S. Jones** | **Name: D. Downie** | **Name: D. Vourdanou** | **Name: D. Locke** |
| **Title: Headteacher** | **Title: Deputy Headteacher** | **Title: Family Support Worker/SLT** | **Title: SENDCO, SLT** | **Title: Behaviour Team Lead** |
| **Contact: 0208 841 7176** | **Contact: 0208 841 7176** | **Contact: 0208 841 7176** | **Contact: 0208 841 7176** | **Contact: 0208 841 7176** |

The DSL is key to ensuring that proper child protection and safeguarding procedures and policies are in place and adhered to. They will also act as a dedicated resource available for other staff, volunteers and Local Governors to draw upon. Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the school, whether these concerns relate to their child or any other.

The school will maintain robust DSL cover arrangements during school hours. Where the DSL is unavailable, a trained Deputy DSL will act. If neither the DSL nor a Deputy DSL can be contacted, staff must follow the direct referral and emergency procedures set out in this policy without delay.

The DSL will liaise with the Local Authority and work with other agencies in line with statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). The following information regarding additional cover is available in the front entrance of the school and the staff information board located in the staff room.

## *Local Authority (Hillingdon) Contacts*

**Prevent Lead**: Fiona Gibbs
Telephone: 01895 277035
Mobile: 07946 714637
Email: fgibbs@hillingdon.gov.uk

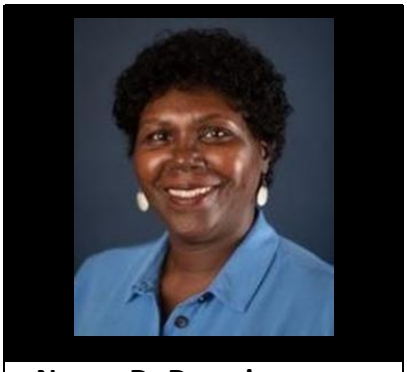
**Hillingdon Social Care – Children (Stronger Families Hub):** 01895 556006
Email: strongerfamilieshub@hillingdon.gov.uk

**Designated Officers: LADO:**
Hannah Ives Deputy LADO: Nicole Diamond
Telephone: 01895 250975 / 07753 431285
Email: hives@hillingdon.gov.uk / ndiamond@hillingdon.gov.uk

**Other Local Authorities - See Appendix 3**

## *Looked After Children*

**The designated person for Looked After Children (DLAC) is:**



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| **Name: D. Downie** |
| **Title: DLAC** |
| **Contact: 0208 841 7176** |

The DLAC will receive appropriate training and will make an annual report to the Governing Body in accordance with the latest statutory guidance. The Governing Body will consider the information in the report and take any appropriate action.
The DLAC will liaise with the Virtual Head for Looked-After Children to ensure that the funding assigned to the child/young person is put to best use. The role will also encompass

the needs of post-LAC students. The arrangements for covering this role should the DLAC be absent or unavailable are as follows:

|  |  |
|---|---|
| **Name: M. Shaw** | **Name: K. Trzaska** |
| **Title: Head Teacher** | **Title: DSL** |
| **Contact: 0208 841 7176** | **Contact: 0208 841 7176** |

As part of their role, they will:

- work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

**Our nominated Safeguarding Governor and LAC link Governor is Balevir Grant**

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| **Name: Balevir Grant** |
| **Title: Chair of Governors** |
| **Contact: 0208 841 7176** |

## Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance, *Keeping Children Safe in Education 2026*, *Working Together to Safeguard Children 2026*, and the *Academy Trust Governance Guide*. We comply with this guidance and the procedures set out by our local safeguarding partnership.

This policy is also based on the following legislation:

- Parts 3 and 4 of the schedule to the *Education (Independent School Standards) Regulations 2014*, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026), which defines regulated activity in relation to children. The 2026 Act removes the previous supervision exemption from regulated activity. Safeguarding Vulnerable Groups Act 2006
- Operation Encompass statutory guidance, which explains the statutory arrangements for police notification to schools following domestic abuse incidents.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For

example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

This policy takes account of locally agreed multi-agency safeguarding procedures and current Department for Education statutory guidance.

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

## Scope and Publication

Safeguarding and child protection is everyone's responsibility and as such this policy applies to all staff (including agency staff), Governing Body members and volunteers working in the school and applies wherever staff or volunteers are working with pupils even where this is away from the school, for example at an activity center or on an educational visit. This policy is published on the school's website and can also be made available in large print or another accessible format if required.
The Governing Body Members take seriously their responsibility under Section 175 of the Education Act 2002 and are aware of their obligations in relation to the legislation and statutory guidance above to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

The DfE 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 that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Effective child protection is essential as part of wider work to safeguard and promote

the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

## Principles

The school has a statutory duty to promote and safeguard the welfare of children and have due regard to guidance issued by the Department for Education.

The Willows School recognises its legal and moral duty to promote the wellbeing of children, protect them from maltreatment, and respond to child abuse, as well as its responsibility to follow the local inter-agency procedures of the Hillingdon Local Authority Safeguarding Multi-Agency Partnership (MAP). The Multi-agency partnership consists of three member groups – the Police, integrated care boards and the Local Authority Social Care. These have been established since September 2019.

We recognise the importance of a whole school approach to safeguarding and child protection; all systems, processes and policies should operate with the best interests of the child at their heart and in accordance with local procedures.

We believe that every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice which results in a child being physically or psychologically damaged. We believe that children must receive the right help at the right time to address risks and prevent issues escalating.

We believe that children have the right to have their views heard and considered by all professionals when making decisions to keep the child safe from harm. We will actively enable and encourage children to participate in an open dialogue with all school stakeholders about safeguarding matters and include them in decisions about safeguarding practices, developing an inclusive and open ethos to keeping them safe.

We agree that we have a primary responsibility for the care, welfare and safety of the pupils in our charge, and we will carry out this duty through our teaching and learning, extra-curricular activities, pastoral care and extended school activities. We will teach about safeguarding, including keeping safe online, as part of providing a broad and balanced curriculum covering relevant issues through personal, social health and economic education.

We additionally understand that as a school we play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our behaviour policy, pastoral system and as above, our inclusive and regularly delivered PSHE curriculum.

We always maintain an attitude of 'it could happen here'. When we have concerns about the welfare of a child, staff will always act in the interest of the child and will raise these with the school's Designated Safeguarding Lead. In exceptional circumstances, such as in an emergency or a when a genuine concern has not been appropriately acted upon, staff

members will speak directly to children's social care.

The school seeks to adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. The school hopes that parents and children will feel free to talk about any concerns and will see school as a safe place if there are any difficulties at home. We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggressive or withdrawn.

Every complaint or suspicion of abuse from within or outside the school will be taken seriously and in all proper circumstances will be referred to an external agency such as children's social care services, the LA designated officer(s), police or the NSPCC, without investigation by the school. (The appropriate person(s) only (Headteacher and/or DSL or deputy DSL) will have completed the relevant information gathering and due consideration process appropriate to their level of skill and expertise, prior to seeking further advice or making a referral).

The name of the school's Designated Safeguarding Lead and their deputy/s will be clearly advertised throughout the school, with a statement explaining the school's role in referral and monitoring.

## Equality Statement

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

We give special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions
- those who are educationally disadvantaged
- are young carers
- are looked-after or previously-looked-after
- may experience discrimination due to their race, ethnicity, religion/faith, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- are at risk of honor-based abuse, FGM and/or forced marriage, sexual exploitation, or Radicalisation
- appear vulnerable to criminal exploitation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are missing or absent from education for prolonged periods and/or repeat occasions
- whose parent/carer has expressed an intention to remove them from school to be home

educated

## Roles and Responsibilities

**School staff (including volunteers, students and Governing Body members)**

All staff will safeguard children's wellbeing and promote their welfare: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and by taking appropriate action to enable all children to have the best outcomes.

All staff, including those who do not work directly with children, MUST read Part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education 2026 in full and review it at least annually. *Keeping Children Safe in Education*

All Governing Body Members will read Keeping Children Safe in Education 2026 in its entirety. The School Leadership Team, Designated Safeguarding Lead and deputies will also read and use the full guidance relevant to their responsibilities.

All Staff

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. **All** staff will be aware of:

- our systems which support safeguarding, including the child protection policy (including procedures for dealing with child-on-child abuse), staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the online safety policy (which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring), the behaviour policy, and the safeguarding response to children who go missing from education
- The school's unauthorised absence procedures and children missing education procedures
- the process for community-based Family Help assessments and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse, controlling or coercive behaviour, stalking, financial exploitation, child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), serious violence (including that linked to county lines),

FGM and radicalisation; staff will understand that safeguarding issues can overlap and that children may experience more than one form of harm

- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- the fact that mental health concerns can, in some cases, develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide, and can also be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation
- the terms victim and perpetrator ensuring they recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way thus using a term that the child is comfortable with; equally for alleged perpetrator(s)/perpetrators thinking carefully about what terminology is used (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too - as a school we will decide what's appropriate and which terms to use on a case-by-case basis
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- the fact that children can be at risk of harm inside and outside of their home, at school and online
- the fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender-questioning (LGBTQ+) can be targeted by other children and thus will provide a safe space for these pupils to speak out and share their concerns
- the fact that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, and that these experiences may affect welfare, wellbeing, mental health and willingness to seek help
- what to look for to identify children who need help or protection
- all new staff and volunteers will receive basic safeguarding training as part of their induction and be expected to read and understand the Child Protection and Safeguarding Policy

The section on training and the appendix of this policy outline in more detail how staff are supported to do this.

## Main responsibilities of the DSL

### Managing referrals:

- refer all cases of suspected child abuse to children's social care services
- refer as appropriate any cases to involving suspected radicalisation to the Channel programme
- refer all safeguarding concerns involving adults (staff & volunteers) to the LA designated officer(s)
- refer an individual to the Disclosure and Barring Service (when a staff member has harmed or poses a risk of harm, to a vulnerable adult or child, or has been dismissed for harming a vulnerable adult or child or would have been dismissed had they not left employment)
- refer to the DfE when checking the Teacher's Prohibition List for all teachers employed by the school and for making referrals for teacher misconduct; checks will be completed on all staff involved in teaching
- inform the Police (cases where a crime may have been committed) with due regard to NPCC 'When to call the police' guidance
- liaise with the Headteacher to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

**This is a legal duty and the school will work with the relevant people in completing and making the referral.**

## Training

Receive appropriate training every two years (or more regularly) and ensure that updates are accessed on an annual basis through the Local Authority or MAP.
Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.
They should:

- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners
- understand the assessment process for community-based Family Help, targeted early help through Family Help, and statutory intervention, including local criteria and referral arrangements
- understand relevant data protection legislation, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, and the statutory information-sharing framework for safeguarding children
- understand and participate in child protection conferences and reviews, including providing reports
- ensure each member of staff has access to and understands the school's Child Protection and Safeguarding policy and procedures, especially new, agency/supply and part-time staff
- be alert to and support the specific needs of children in need, those with

educational needs, looked after children, children with SEND, children with a social worker and young carers

- attend relevant and refresher training courses, including online safety
- organise child protection induction and update training annually for all school staff.
- encourage a culture among all staff of listening to children and taking account of their wishes and feelings, and any measures the school may put in place to protect them
- ensure that at least one interview panel member of each interview has undertaken Safer Recruitment training

## Raising awareness

- ensure the school's policies are known and used appropriately
- ensure the school's Child Protection and Safeguarding policy is reviewed annually and the child protection procedures are in line with the LA, MAP, working with the Governing Body to achieve this
- ensure the Child Protection and Safeguarding Policy and procedures are available publicly, and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the local MAP to make sure staff are aware of training opportunities and the best local policies on Child Protection and Safeguarding.
- keep written records of concerns about a child even if there is no need to make an immediate referral
- maintain detailed, accurate, secure written records of concerns and referrals and ensure actions are recorded and acted upon
- ensure that all child protection records are kept confidentially and separately from pupil records, in line with the statutory guidance for retaining records, and are passed on to the child's next school in a confidential and secure manner, ensuring a confirmation receipt is obtained on delivery
- ensure that the existence of the child protection file is marked on the pupil records.
- ensure that any pupil with a child protection plan who is absent from the educational setting without explanation is referred to children's social care immediately
- ensure the school follows up any unexplained absences immediately and refer this to the appropriate agency (educational welfare service, social care or the police) if the child cannot be located. Ensure that the school follows local Child Missing in Education procedures
- encourage a culture of listening to children and taking account of their wishes and feelings, in any measures, the school may put in place to protect them
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff
- ensure that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; support teaching staff to identify the challenges that children in this

group might face and the additional academic support and adjustments that they could make to best support these children
- have a good understanding of harmful sexual behaviour
- ensure they know and have discussed the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to inform the school's policies
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. Further information can be found in the Statutory guidance - PACE Code C 2019

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- have strategic oversight of the school's online filtering and monitoring systems (devices and networks) and ensure that the annual effectiveness review is conducted as detailed in the Online Safety section of this policy
- provide, with the Headteacher, a termly report for the Local Governing Body
- provide the Trust (if applicable) with termly safeguarding reports

The DSL and their deputy must undertake child protection training and training in inter-agency working every two years (or more regularly) and will attend annual refreshers provided by the LA/MAP to remain updated on policy, procedures and developing concerns nationally and regionally.
Their full responsibilities are outlined in the job descriptions of both the DSL and the Deputy DSL.

## *The Headteacher*

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

- ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation
- communicating this policy to parents when their child joins the school and via the school website
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety training, and update this regularly
- acting as the 'case manager' in the event of an allegation of abuse made against

another member of staff or volunteer, where appropriate
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- ensuring the relevant staffing ratios are met, where applicable
- overseeing the safe use of technology, mobile phones and cameras
- ensuring the school has at least two emergency contact details for each pupil/student

## The Governing Body

- helps promote educational outcomes by sharing the information about the welfare, safeguarding and child protection that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff
- ensure that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- provide, with the Headteacher, a termly safeguarding report for the Governing Body
- all governors will read Keeping Children Safe in Education in its entirety

## Reporting and Recording

It is the responsibility of all adults in school to ensure that any safeguarding concerns they may have, are reported to the Designated Safeguarding Lead in school.

This school requires all staff to record non-urgent concerns on CPOMS as soon as possible, preferably within the same day. Any urgent concerns, where a child might be at risk of significant or immediate harm must be reported immediately to the DSL (or in their absence the DDSL) and then reported in writing onto CPOMS as soon as possible within the same day or as directed by the DSL on that occasion.

All reports will include complete details of the child, any others involved and of the incident. All names will be written in full and all people mentioned will be given their designation (i.e. “Fred, father of John”).

The language used by the child/student in any disclosure, must be reported and not substituted by the adult reporting.
The report will be considered a formal document and so all details must be clear so that, if referenced at a later stage, the person reading it has a clear understanding of who is involved and what occurred.

Reports may be submitted as part of legal proceedings.
Where a child/student has such a file, this will be indicated on their general pupil file.
Next steps for the concern will be followed up by the DSL and DDSL. (See referral procedures.)

## Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- put systems in place for pupils to confidently report abuse
- ensure our reporting systems are well promoted, easily understood and easily accessible for children
- make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- children are made aware that they can talk to any Willows staff, we also have a Safeguarding team where students can go to talk about their concerns. Reminders come throughout the year in assemblies and PSHE lessons
- following a disclosure, the next steps that staff will need to take will be shared with the child/s. This will consist of sharing the information with the relevant people in order to progress a concern which may involve outside agencies, social care and in some cases the police. The safety of our children will always remain paramount in our next steps

We take all concerns seriously and offer reassurance to children throughout the process.

## Confidentiality and information sharing

Timely information sharing is essential to effective safeguarding. The Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 do not prevent or limit the sharing of information for the purpose of keeping children safe. Fears about sharing information must not stand in the way of promoting children's welfare and protecting their safety. Staff should share information on a need-to-know basis, proportionately and securely, and should seek advice from the DSL where they are unsure.

From 30 September 2026, the school will have regard to the statutory guidance "Information sharing duty" statutory guidance (under section 16LA of the Children Act 2004).

When deciding whether to share information, staff and the DSL will consider the safeguarding purpose, the potential risks of sharing or not sharing, the minimum information necessary, who needs the information, and how it will be shared and recorded.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent,

it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The school will ensure that all child protection records are kept confidential and only allow disclosure to those who need the information in order to safeguard and promote the welfare of children. The school will cooperate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

If staff are in any doubt about sharing information, they will speak to the Designated Safeguarding Lead (or deputy) regardless of any duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the Designated Safeguarding Lead (who in turn will refer immediately to the Local Authority children's social care) in accordance with this policy. All staff may raise concerns directly with children's social care services.

The school will ensure that a clear protocol regarding communication using walkie-talkies is established and shared with relevant staff so no compromise or detriment to any safeguarding information occurs.

## *Recognising abuse and taking action*

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for universal services, community-based early help or targeted Family Help for a child who:

- is disabled
- has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from education, care or home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol
- is suffering from mental ill health

- has returned home to their family from care
- is at risk of honour or faith-based abuse (such as female genital mutilation (FGM)) or forced marriage
- is a privately fostered child
- has a parent or carer in custody or is affected by parental offending
- is missing education, or persistently absent from school, or not in receipt of full-time education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff should recognise that children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Staff (including temporary staff), volunteers and Governing Body Members must follow the procedures set out below in the event of a safeguarding issue.

We choose to refer via the DSL in the majority of cases because they may have wider knowledge about the family/circumstances that is unknown to the rest of staff. This also ensures that the person responsible for Safeguarding and Child Protection has a comprehensive picture of what is happening in school.

Nevertheless, where a staff member has a concern and the DSL or DDSL cannot be located or where the staff member feels the response from the DSL/DDSL is inadequate, the staff member **MUST** refer the case into Social Care using the processes and procedures below.

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

Early identification of abuse and neglect is vital. Staff will always speak to the Designated Safeguarding Lead to escalate their concerns. In exceptional circumstances, such as in an emergency or if they believe that a genuine concern that they have has not been appropriately addressed, they will speak directly to children's social care.

Should the DSL or their deputy not be contactable immediately, staff will refer to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm.

Staff will then notify the DSL as soon as possible.
Link to the GOV.UK webpage for reporting child abuse to your local council:
https://www.gov.uk/report-child-abuse-to-local-council

## *If a child makes a disclosure to you*

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

- listen to and believe them. Allow them time to talk freely and do not ask leading questions. Staff should not take a decision as to whether or not the abuse has taken place

- stay calm and do not show that you are shocked or upset
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- explain what will happen next and that you will have to pass this information on – DO NOT promise to keep it a secret
- write up your conversation as soon as possible in the child's own words. Stick to the facts and do include your own judgement. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record andany evidence must be kept securely and handed to the DSL as soon as possible
- sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process Record concerns onto CPOMS in accordance with the procedures set out in school

Bear in mind that some children may:

- not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- not recognise their experiences as harmful
- feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- none of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child

**Do not investigate suspicions regarding child protection issues.**

## *Action by the Designated Safeguarding Lead – concerns about children*

The action to be taken by the DSL will take into account:

- the local inter-agency procedures of the Hillingdon Multi Agency Safeguarding Hub (MASH)
- the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care or the Police. In case of serious harm, the Police will be informed from the outset
- the wishes of the pupil who has made an allegation will be considered, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes
- the wishes of the complainant's parents provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in

some circumstances. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk; s/he will take further advice from the relevant professionals before making a decision to disclose

- duties of confidentiality, so far as applicable (and as referenced above)

## *Referral*

If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care services on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, the DSL will make a referral without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to children's social care services within 24 hours.

If no response or acknowledgment is received within three working days, the DSL will contact children's social care services again. Should the school require further support in escalating the case then they will seek further advice.

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

The Department for Education's Keeping Children Safe in Education 2026 explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. **This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.**

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or discovers that a pupil age 18 or over appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

**If you believe, a girl is at risk of FGM please contact *Hillingdon MASH or relevant Local Authority* to make a safeguarding referral.**

## *Family Help / Early Help*

All staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any staff member who has a concern about a child's welfare should follow the referral processes.

If Early Help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

## *Local (Hillingdon) procedures for Family Help / Early Help - Stronger Families & the Children's Portal*

Stronger Families is a 24/7 front door to ensure that local families have fast access to a wide range of support services around the clock.
Stronger Families is a locality based Early Help and Prevention Service supporting children at the earliest possible stage by working closely with partners across Hillingdon.
Hillingdon's vision is to empower families to be and feel strong, safe and healthy through the provision of early and targeted support to reach their full potential. To achieve our vision, we need to respond to need when it arises and work together to ensure we have the right person for the child and family leading the right intervention. To support this the Children's Portal, has been developed. The Children's Portal allows agencies referring into Hillingdon to complete an Early Help Assessment online and submit it directly to the Stronger Families Hub.
The Hillingdon Stronger Families web page is the first point of access for Stronger Families online services. The web page can be accessed via the following web address:
https://www.hillingdon.gov.uk/stronger-families

## *If you have concerns about extremism*

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's

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

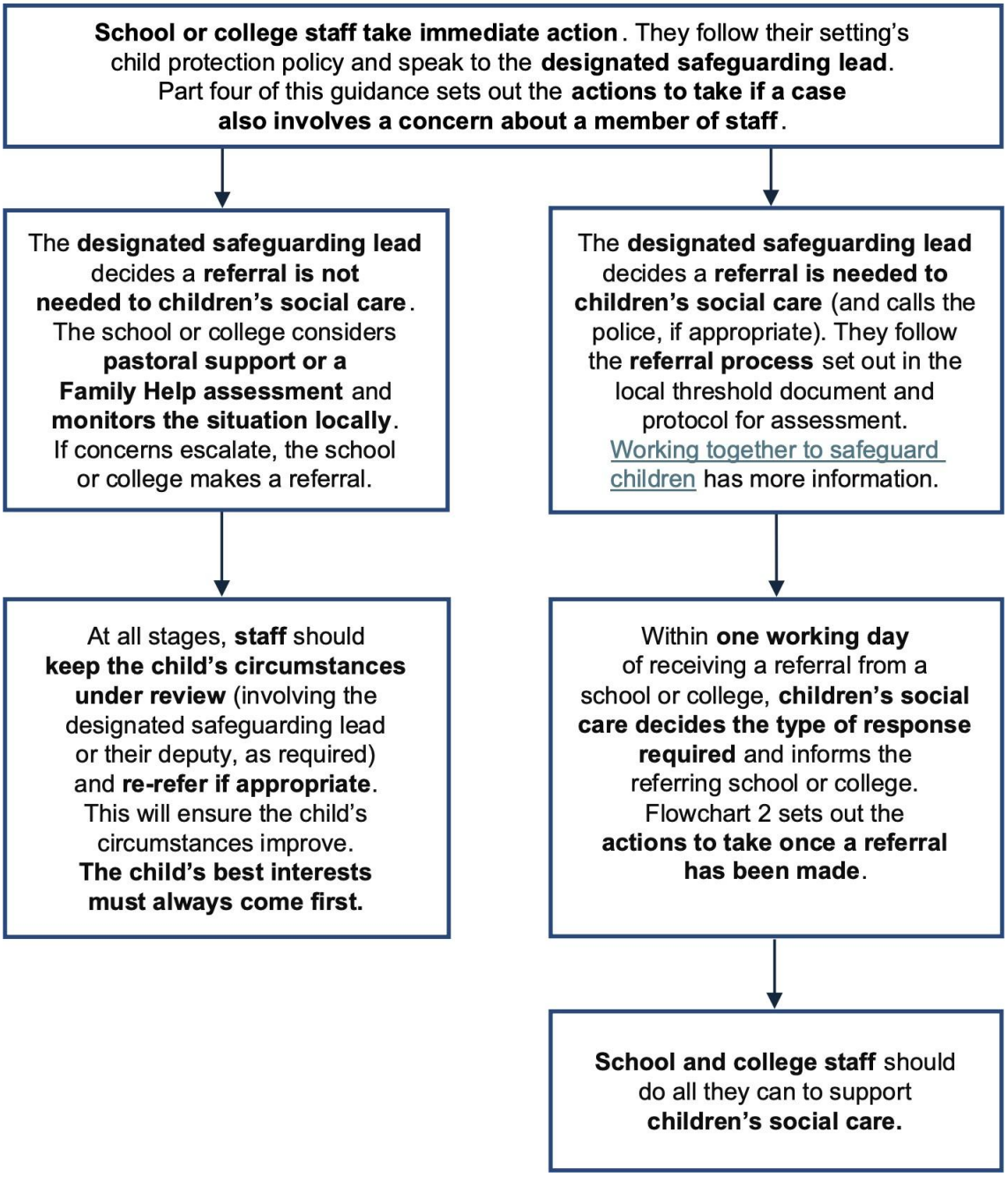
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the Local Authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 0207 340 7264, that school staff and Local Governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

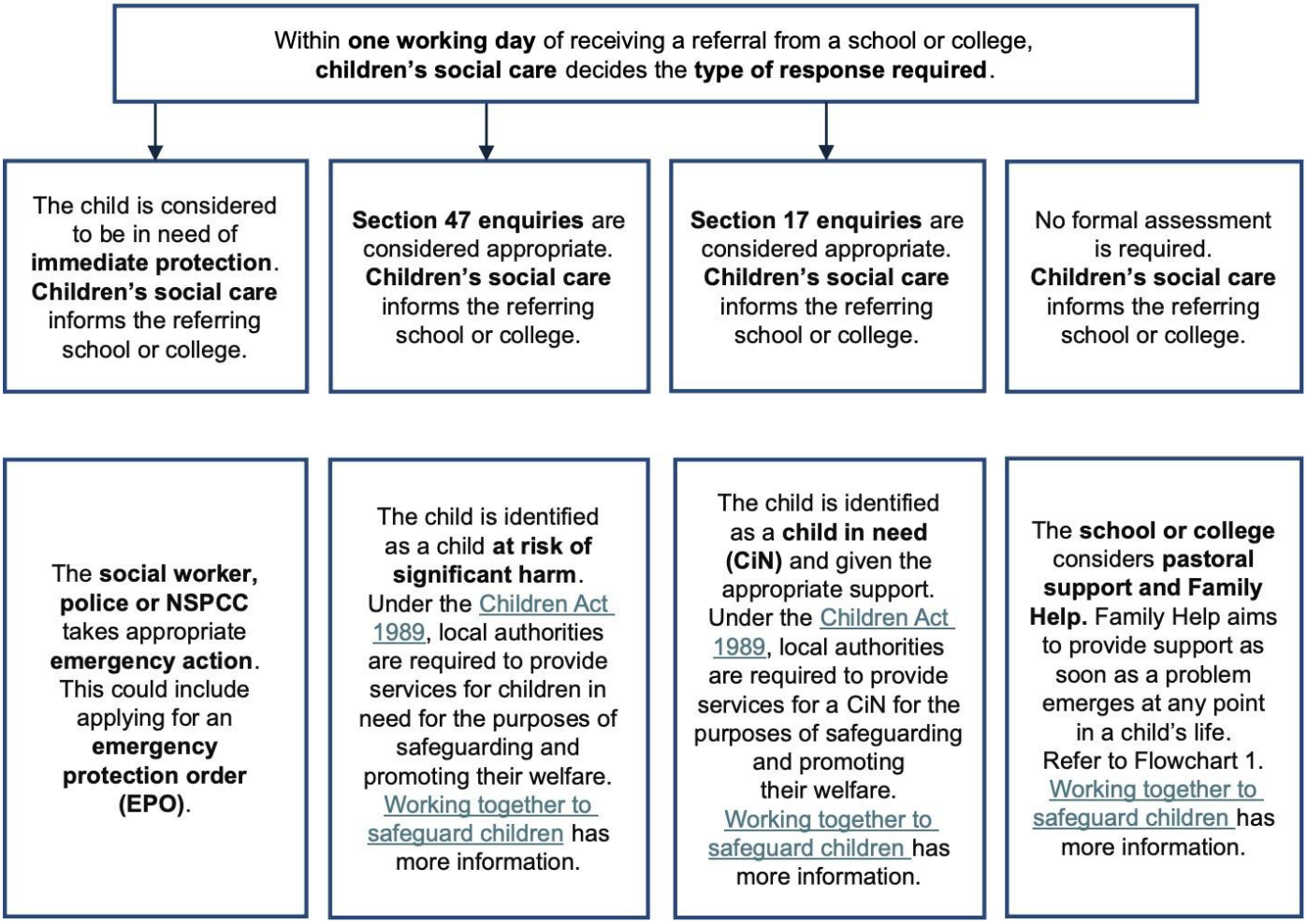
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

**Flowchart 1: actions taken by a school or college when there are concerns about a child**



**Flowchart 2: actions taken once a referral has been made to children's social care**



# Child-on-Child abuse (including harassment and violence).

## Harmful Sexual Behaviours (HSB)/Sexual Harassment/Sexual Violence

All staff should be aware that children are capable of abusing other children, should be able to identify this and know what to do. This abuse should be recognised as on a clear, progressive continuum: HSBs-Sexual Harassment -Sexual Violence)

We recognise that even if there are no reported cases of child-on-child abuse, it may still be taking place but is just not being reported. We have a zero-tolerance approach to abuse, and it will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up' as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We recognise that the abuse can happen in or out of school, face-to-face or online and can occur simultaneously between the two; that it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns.

Further guidance is given in KCSiE, Part 5 Child on Child Sexual Harassment and Sexual Violence.

### Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which includes hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- making or sharing nudes or semi-nudes includes photographs, videos or live streams and also images that are digitally altered or wholly AI-generated (sometimes referred to as deepfakes or deep nudes). All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response,

whether consensual or non-consensual

- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause their victim humiliation, distress or alarm. This is a criminal offence thus there is a duty to report to the police (See Appendix 2)
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- violence against women and girls (advice due) and incel linked behaviour (linked to misogyny, harmful sexual behaviour and serious violence)
- threat of harm with a weapon (Staff will report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or DDSL).

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Further support can be found in the NSPCC guidance on typical stages of sexual development to inform our understanding and *UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes advice for education settings working with children and young people (December 2020, updated March 2024)*

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

- you must tell the DSL and record the allegation, but do not investigate it
- the DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- the DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made and any other children affected by child-on-child abuse – with a named person they can talk to if needed, aware there may be physical and mental health implications requiring further support as well as signposting for additional support. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- the DSL will take the lead role in any disciplining of the alleged perpetrator(s) School will provide support at the same time as taking any disciplinary action
- if the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation
- disciplinary action can be taken while other investigations are going on e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a

case-by-case basis, taking into account whether:

- taking action would prejudice an investigation and/or subsequent prosecution we will liaise with the police and/or LA children's social care to determine this
- there are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing (See KCSIE 2026 Paragraph 548 for further detail)

- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- there is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies
- the DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- the DSL should consider that: Parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 'the seven golden rules' for sharing information, and will support staff who have to make decisions about sharing information

- if staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

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

- being proactive with action to minimise the risk of child-on-child abuse and creating

a supportive environment where victims feel confident in reporting incidents

- challenging any form of derogatory or sexualised language or behaviour
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- ensuring pupils know they can talk to staff confidentially by providing a safe and secure environment, where pupils are encouraged to speak openly will all adults in the school as per our vision and values
- being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- supporting children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- ensuring staff reassure victims that they are being taken seriously
- ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- knowing how to recognise the indicators and signs of child-on-child abuse, knowing how to identify it and respond to reports
- knowing that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- knowing that if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - children can show signs or act in ways they hope adults will notice and react to
    - a friend may make a report
    - a member of staff may overhear a conversation
    - a child's behaviour might indicate that something is wrong
- Ensuring staff are trained to understand
    - that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - that they should speak to the DSL if they have any concerns
    - dealing with any child-on-child abuse must be in a timely manner

**Informing parents/carers**

Parents/carers will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LA designated officer(s), the Police and/or the Headteacher before discussing details with parents/carers. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

**External agencies**

Whether or not the school decides to refer a particular complaint to children's social care services or the police, the parents and pupil will be informed of their right to make their own complaint or referral to the children's social care services or the child protection unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.

## *Specific safeguarding concerns*

All staff should have an awareness of the safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nude and semi-nudes, including those generated by AI, put children in danger. We will take into account the specific needs of children/young people in difficult circumstances and will ensure that their additional needs are taken into account and dealt with according to the local authority arrangements and KCSIE September 2026.
Such circumstances include:

- child abduction and community safety incidents
- children and the court system
- children with family members in prison
- child criminal exploitation / child sexual exploitation
- county lines
- cybercrime
- domestic abuse
- homelessness
- modern slavery and the National Referral Mechanism
- honour or faith-based abuse (HBA) abuse (such as female genital mutilation (FGM) or forced marriage)
- preventing radicalisation
- child-on-child abuse
- sexual violence and sexual harassment between children in schools

**See Appendix 2 below for more details**

## Children with Special Educational Needs, Disabilities or Health Issues

Children with Special Educational Needs and Disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- the potential for children with SEND and disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- risks that a child may not understand that what is happening to them is abuse
- the need for intimate care, increased dependence on adults for care, or greater isolation from others
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

To this end, we will ensure there is extra pastoral support for children with SEND.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCO

**Pupils with medical conditions**

An incident relating to the management of a child's medical condition, including allergies, does not by itself warrant a safeguarding referral. A referral will be made where an incident highlights concern that the child may be at increased risk of neglect, abuse or exploitation because of their medical condition; for example, where important medical information is withheld from the school or the child is repeatedly sent to school without essential medication.

**Young carers**

The school recognises that caring responsibilities can affect a child's attendance, attainment, behaviour and wellbeing. Early identification is important so that young carers receive appropriate support from the school and, where needed, external partners, the local authority or health services.

## Children with a Social Worker

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

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

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

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

## *Looked-after and previously looked-after children*

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

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

Our designated person is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

- work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- work with Virtual School headteachers to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## Pupils who are lesbian, gay or bisexual

The school recognises that being lesbian, gay or bisexual is not in itself a risk factor for harm. However, pupils who are, or are perceived to be, lesbian, gay or bisexual can be vulnerable to discriminatory bullying. Any safeguarding concerns will be reported to the DSL, and the school will provide a safe environment in which pupils can speak openly and seek support.

## Pupils who are questioning their gender

**Pupils who are questioning their gender**

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs and difficulties relating to family, peers or the wider social environment.

The school will take a careful, child-centred approach. The DSL will lead where safeguarding issues arise. The school will take a strong stance against bullying and

harassment based on gender while also considering the rights of pupils and staff under equality and human rights law.

Where a pupil who is questioning their gender asks the school for support, parents/carers will normally be engaged as a matter of priority. In the rare circumstances where involving parents/carers may place the pupil at greater risk, the DSL will determine the safeguarding response before parents/carers are contacted or decisions are taken.

**Social Transition**

The school will not initiate social transition. Where a pupil or parent/carer requests changes or support relating to social transition, decisions will be made by the school with parents/carers involved, taking account of the pupil's best interests, the interests of other children, safeguarding duties, and obligations under the Equality Act 2010 and Human Rights Act 1998. The decision-making process will be recorded and reviewed if circumstances change.

In summary

- The school will only respond if a child or parent specifically requests support for social transition
- Primary schools must exercise "particular caution" and full social transition should be agreed "very rarely"
- Staff must not adopt any changes relating to social transition without parental involvement, except in exceptionally rare cases where this would pose greater risk
- The school is legally required to record a child's biological sex accurately wherever it is recorded
- The decision-making process will be recorded and reviewed if circumstances change

Single-sex toilets, changing rooms and showers will be managed in accordance with KCSIE 2026

- Children are prohibited from entering toilets, changing rooms, boarding/residential accommodation designated for the opposite biological sex
- The same applies for PE classes or sports designated for a specific sex
- No exceptions are permitted, even when supporting a child's social transition
- Where a pupil doesn't wish to use facilities for their biological sex, the school will consider a safe alternative protecting all pupils' privacy, dignity and safety

For PE and sport, the school will follow KCSIE 2026 and relevant governing-body guidance. Where single-sex participation is required for safety, there will be no exception; in other circumstances the school will consider requests carefully in light of safety, fairness, safeguarding and equality duties.

## Restrictive interventions, including the use of reasonable force

The school follows the Department for Education guidance Restrictive interventions, including the use of reasonable force, in schools. Any use of force or other restrictive intervention must be lawful, necessary, reasonable, proportionate and in the best interests of the pupil and others.

The school will seek to minimise the need for restrictive interventions through prevention, positive relationships, de-escalation, appropriate staffing, individual planning and review. A 'no contact' approach will not be adopted where it would prevent staff from appropriately supporting or protecting pupils.

All significant incidents involving the use of force, and incidents of seclusion where the statutory requirements apply, will be recorded and reported to parents/carers in accordance with the Education and Inspections Act 2006, the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025 and current DfE guidance.

When considering or using restrictive interventions with pupils with SEND or medical conditions, staff will take account of additional vulnerabilities, reasonable adjustments, non-discrimination duties and the Public Sector Equality Duty. The school will review patterns of restrictive intervention and use learning from incidents to reduce future need.

Further detail is set out in the school's Positive Handling Policy.

## Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. They should consider the context within which such incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Details of the school's key contextual issues are:

- threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online
- these threats can take a variety of different forms and children can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation
- assessments of children in such cases should consider whether wider environmental factors are undermining effective intervention being undertaken

- to reduce risk with the child and family. Parents and carers have little influence over the contexts in which the abuse takes place and the young person's experiences of this extra-familial abuse can undermine parent-child relationships

Children's social care assessments should consider such factors, so it is important that school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Further information can be found in Working Together to Safeguard Children 2026, KCSIE 2026 and www.contextualsafeguarding.org.ukwww.contextualsafeguarding.org.uk

## *Safeguarding concerns about a staff member, supply teacher, trainee teacher, volunteer or contractor*

At The Willows School, we recognise the possibility that adults working in the school may harm children this includes governors, volunteers, supply teachers, trainee teachers, contractors and agency staff.

If you have concerns about any adult in the school, speak to the Headteacher without delay, in their absence the DSL.

Where there are concerns about the Headteacher, this should be referred to the Chair of Governors.

You can also discuss any concerns about any staff member or volunteer with the DSL. The Headteacher/DSL will then follow the procedures set out in the Managing Allegations against Staff Policy, as appropriate. I

f a staff member feels unable to raise their concerns/issues with their Headteacher or feels that their genuine concerns are not being addressed, they must refer to the Whistleblowing Policy and/or contact NSPCC Whistleblowing advice line directly.
If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where concerns relate to supply teachers, trainee teachers or contracted staff, the school will work with the relevant employer or training provider and will not end an assignment or placement simply as a means of avoiding the safeguarding process. The school and third-party organisation share safeguarding responsibilities and will ensure concerns are addressed in accordance with KCSIE 2026 and LADO procedures.

## *Managing safeguarding concerns and allegations about staff*

The school has policies and procedures for dealing with allegations against staff (including supply staff and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations.
These procedures follow the DfE guidance Keeping Children Safe in Education 2026, Part 4 and should be used where any adult, including members of staff, supply staff, volunteers

or contractors 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, OR
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

These are also known as the harm test.

The last bullet point above includes behaviour that may have happened outside of the school, that might make an individual unsuitable to work with children, this is known as transferable risk.

**All allegations will be reported by the Headteacher immediately, or to the Chair of the Governing Body in the initial stages where the Headteacher is the subject of the allegation.**
**In the cases of all allegations against staff or volunteers, the Headteacher will then inform the relevant member of the Governing Body as a serious reportable issue. Allegations must not be shared with other staff, parents or pupils.**

On receiving an allegation, the Headteacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

When a person reports an allegation of abuse against a member of staff or volunteer at the school which appears to meet the above criteria, the Headteacher will immediately contact the Local Authority Designated Officer (LADO) before further action is taken. Where there is any doubt as to whether the criteria have been met the LADO must be informed.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Where an allegation is made about a supply teacher, whilst the school is not the employer, they should ensure that all allegations are dealt with properly. In no circumstances should the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome.

The accused person will be informed of the allegation as soon as possible after the LADO has been consulted. Appropriate support and a representative will be provided to keep the accused person informed of the progress of the case as appropriate.
Suspension will **not** be an automatic response to an allegation. Full consideration will be

given to all the options, subject to the need to ensure:

- the safety and welfare of the pupils or pupil concerned; and
- the need for a full and fair investigation

Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm, or of allegations of harm toward a pupil. This guidance is contained in the Staff Code of Conduct.

## *Ceasing to use staff*

If the school ceases to use the services of an accused member of staff (or Governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used. A referral to the Disclosure and Barring Service (DBS) will be made. If the staff member is a teacher, a referral will be made to both the Disclosure and Barring Service and the Teaching Regulations Agency (TRA) by the school with the support of the Governing Body if required. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the Governors without delay.

**Resignation**

If a member of staff (or Governor or volunteer) tenders his/her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the school. Resignation will not prevent an investigation or the conclusion of an investigation and may prompt detailed referrals being made to the DBS and/or the TRA.

**Criminal proceedings**

The school will consult with the LADO following the conclusion of a criminal investigation as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed.

**Record keeping and retention of documentation**

Details of **substantiated** (sufficient evidence to prove the allegation) and **unsubstantiated** (insufficient evidence to prove or disprove the allegation) allegations will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

**Substantiated** allegations will be referred to in references.
**Unsubstantiated** allegations will not normally be referred to in references requests, but if the Headteacher is explicitly requested, he will seek the advice of the LADO before responding to the request.

Allegations that are found to have been **malicious** (sufficient evidence to prove the allegation and there has been a deliberate act to deceive), **false** (sufficient evidence to disprove the allegation) or **unfounded** (where there is no evidence or proper basis which supports the allegation being made) will be removed from the employee's records.

## *Malicious and unsubstantiated allegations made by students/pupils*

Where an allegation by a student/pupil is shown to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance

with the school's behaviour policy. The LADO will refer the matter to children's social care to determine whether the child is in need of services, or to consider if the child might have been abused by someone else.

School may choose to note this malicious allegation on the pupil's record for information only, where a pattern of malicious referrals might be made. (See KCSIE September 2026, Part 4 for further guidance).

## *Low Level Concerns about staff behaviour*

**Definition of low-level concerns-**The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and/or does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- being overly friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

Concerns may arise through, for example:

- suspicion
- complaint
- disclosure made by a child, parent or other adult within or outside the school
- pre-employment vetting checks

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

### Sharing low-level concerns

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

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns

- empowering staff to self-refer (for example, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping to identify any weakness in the school's safeguarding system

## *Responding to low-level concerns*

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct Policy.

**Low-level concerns should be reported to the Headteacher or DSL (who will inform the Headteacher); or Chair of Governors if about the Headteacher (KCSIE 2026 paragraph 70/71).**

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL (and it should be explained to staff how they will work together in the process/procedure for confidentially sharing low-level concerns).

## *Record keeping*

All low-level concerns will be recorded in writing, to include:
Name* of individual sharing their concerns.

- details of the concern
- context in which the concern arose
- action taken
- rationale for decisions and action taken

*(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)*

Records will be:

- kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or,

where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the LADO

(if there is any doubt about the low-level concern and whether it meets the threshold or not the school should contact the LADO)

- retained at least until the individual leaves employment at the school

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

### *References*

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

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

### *Whistleblowing*

All staff are required to report to the Headteacher, or relevant Governor in his/her absence, any concern or allegations about school practices or the behaviour of colleagues, which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

Concerns regarding the Headteacher should be made to Chair of Governors whose contact details are readily available to staff via the school office. Advice should be sought from the LADO or the NSPCC Whistleblowing advice line who provide independent advice. Concerns regarding Governors should be referred to the LADO.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – lines are available from 8:00 AM to 8:00 PM, Monday to Friday or email: help@nspcc.org.uk

More information about whistleblowing can be found within the Whistleblowing Policy or at https://www.gov.uk/whistleblowing

## *Safer Recruitment*

To ensure that children are protected whilst at this school, we will ensure that our staff and volunteers are carefully selected, screened, supervised and trained.

We accept that it is our responsibility to follow government guidance regarding safer recruitment.

We will ensure that the checks will be made in conjunction with the relevant agencies including the Disclosure and Barring Service (DBS), the DfE, and the Home Office.

The checks include:

- Identity, including name and current address
- Right to work in the UK
- Qualifications
- DBS checks
- Children's Barred List
- Overseas checks
- References (in accordance with the Safer Recruitment Policy)
- Medical Fitness
- Prohibition from Teaching
- Prohibition from Management (s128) (where applicable to the role)
- Prohibition from working in other EEA schools (only up to 31/12/2020, For overseas checks post EU exit 1st January 2021, see KCSiE Part 3 and https://www.gov.uk/guidance/recruit-teachers-from-overseas.)
- Childcare (Disqualification) Regulations 2009 (for staff members but not Disqualification by Association checks)
- Online search on shortlisted candidates

These checks will be made in accordance with the Safer Recruitment Policy. They will be made in accordance with the role applied for.

### Volunteers

Regulated activity and volunteers: the school will apply the definition of regulated activity in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Crime and Policing Act 2026. The previous supervision exemption has been removed.
Any volunteer who meets the relevant frequency criteria (more than 3 days in a 30 day period or overnight) for teaching, training, instructing or supervising children is now legally in regulated activity and requires an enhanced DBS check with barred-list information, regardless of supervision arrangements.

The school will also ensure appropriate safeguarding checks and arrangements are in place for trainee teachers, contractors, agency/supply staff, visitors and any person working with children in other settings, in line with Part 3 of KCSIE 2026.

All checks made will be recorded on the school's Single Central Record (SCR) in line with the guidance. Any other checks (medical, references) are not necessarily required to be recorded but may be at the discretion of the organisation. All the checks however must be maintained in the staff personnel files and appropriately recorded as being so (e.g. on a staff personnel file checklist).

Full details of our safer recruitment procedures are set out in the school's Safer Recruitment Policy.

# Online and digital safety

## E-Safety/Online safety at home and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:

- have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- set clear guidelines for the use of mobile phones for the whole school community
- establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 key categories of risk

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

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny/misandry, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

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

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

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

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

- educate pupils about online safety as part of our curriculum; For example:
  - The safe use of social media, the internet and technology in school and when online at home ensuring they are aware of how to report anything deemed inappropriate
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

- train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year
- educate parents/carers about online safety via our website, school communications as well as parents evening ensuring they are aware of how to report anything deemed inappropriate. We will also ensure parents are aware of what we ask children to do online e.g. sites they need to visit or who they will be interacting with online.
- make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - staff will not take pictures or recordings of pupils on their personal phones or cameras
- make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology (the school operates as a mobile phone-free environment", restricting pupil access during lessons, breaktimes, and lunchtimes)
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of online risk and ensure that their effectiveness is reviewed at least once every academic year
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
- The DSL will have strategic oversight of the school's online filtering and monitoring systems. The annual effectiveness review will be led by the SLT member responsible for filtering and monitoring, supported by the DSL and IT support. It will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of those checks and resulting actions will be kept.

The school will work alongside National College, including National Online Safety (NOS) to support statutory staff training requirements and CPD as well as parental updates, courses and key information.

This section summarises our approach to online safety and mobile phone use. For comprehensive

details about our school's policy on online safety and the use of mobile phones, please refer to our e-safety policy, which you can find on our website.

### Artificial Intelligence

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

We recognise that AI has many uses, including enhancing teaching and learning and supporting safeguarding. However, AI may also facilitate abuse, bullying, grooming or exposure to harmful content, including the creation of realistic manipulated or wholly generated images, audio or video such as deepfakes or 'deep nudes'. Any such incident involving pupils will be treated as a safeguarding matter.
We will treat any use of AI to access harmful content or bully students in line with this policy and our anti-bullying policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education and data protection requirements.

## *Record keeping*

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as Local Authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- a clear and comprehensive summary of the concern entered on CPOMS
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the reason for them and the outcome

Confidential information and records including concerns and referrals will be kept in a separate child protection file for each child. These files will be held securely and only available to those who have a right or professional need to see them (e.g. the safeguarding team or relevant external agencies only).

Any non-confidential records will be readily accessible and available.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school (see Retention of records Policy).

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- the first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. The school has an open and transparent approach with regards to sharing information with other agencies when this is appropriate in line with the Hillingdon Safeguarding procedures.

# *Training*

## All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding partnership and the national guidance/initiatives.

The DSL will plan the training cycle so that it covers all aspects of child protection and safeguarding according to the school's contextual needs and in line with the training content overview.

All staff will have training on online safety, including an understanding of the expectations, roles and responsibilities around filtering and monitoring.

All staff will have training on the Government's Anti-Radicalisation Strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins, briefings and staff meetings) as required, but at least annually.

Volunteers, trainee teachers and agency/supply staff working in school will receive appropriate training.

All staff, including Governors will undertake training relevant to their roles and responsibilities.

## The DSL and DDSL

The DSL and DDSL will undertake child protection and safeguarding training at least every two years.

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

They will also undertake Prevent awareness training, at least two yearly

## Governing Body

All Governors receive training about safeguarding and child protection (including online safety and Prevent training) at induction, which is updated regularly, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge. It is also so that they can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

# *Prevention*

We recognise that school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The school will therefore:

- work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to
- include regular consultation with children, e.g. through safety questionnaires, participation in anti- bullying initiatives, participation in the UNICEF Rights Respecting Schools Award or other effective ways of teaching children about their rights (United Nations Convention on the Rights of the Child)
- encourage self-esteem and self-assertiveness, through the curriculum as well as relationships, whilst not condoning aggression or bullying
- promoting a caring, safe and positive environment within the school
- liaising and working together with all other support services and those agencies involved in the safeguarding of children
- supporting families through Early Help initiatives
- provide explicit teaching on safeguarding, Equalities and British Values, which is mapped throughout the curriculum
- provide specific teaching on Relationships Education, elements of Relationships and Sex Education and Health Education as outlined by the Government requirements making this compulsory in September 2020. Please see our PSHE policy for more information https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

(See Public Health England: Rise Above for resources and KCSiE September 2026 Paragraphs 128-133)

**As well as ensuring that we address child protection concerns, we will also ensure that children who attend the school are kept safe from harm whilst they are in our charge.**

To this end, this policy must be seen in light of the school policies and procedures all of which are available on our website or from the school office upon request:

- Anti-bullying Policy

- Safer Recruitment Policy
- Staff Code of Conduct
- Equality, Equity, Diversity and Inclusion Policy (including Racist & Discriminatory Incidents)
- Data Protection policy (GDPR)
- Behaviour Policy (including school rules, rewards, sanctions and the use of exclusion)
- Health and Safety Policy
- Positive Handling Policy
- Dealing with Allegations of abuse made against members of staff
- Preventing Extremism and Anti-Radicalisation Policy
- Young Carers
- Children Missing Education Policy
- Looked-After Children Policy
- Attendance Policy
- Registration of Pupils Policy
- E-Safety Policy
- Curriculum Policy
- PSHE, RSE and SMSC Policies

## *Private fostering - LA notification when identified*

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements.

The school must be clear who has parental responsibility.

The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority.

The school itself has a mandatory duty to inform the local Authority of the private fostering arrangements and thus allow the Local Authority to check that the arrangement is suitable and safe for the child. (A comprehensive guidance on the circumstances in which private fostering may arise can be found at DfE statutory guidance Children Act 1989 Private fostering.

## NSPCC

**The school will clearly advertise the NSPCC**

- contact and Child Line details with a statement about their statutory powers to take action to safeguard children
- dedicated helpline for reporting concerns/ suspicions regarding Female Genital Mutilation (FGM) and Gangs
- the Whistleblowing Advice Line which provides free advice for professionals who wish to raise concerns about how child or young adult protection issues are being handled in their own or other organisations

## School premises

The school will take all practicable steps to ensure that school premises are as secure as circumstances permit, conducting regular risk assessments and maintaining a log of risk assessments, and other health and safety checks. All reportable incidents will be reported to the Governors promptly and health and safety processes followed.

## Checking the identity and suitability of visitors

Visitors and parents are not allowed into school buildings without a visitor's badge and will be accompanied by a member of staff whilst inside the building(s). Visitors wishing to enter the school building must sign in on arrival and sign out again on departure.

Un-badged and unaccompanied visitors inside buildings will be challenged by a member of staff and escorted to the office to complete the signing-in procedures. Those visiting the school site to collect or drop off children or to attend school events are restricted to appropriate areas and will be directed as to which locations are available to them.

School will check the identity of all new agency staff on arrival (by requesting photo id) and ensure the person presenting themselves for work is the same person that the agency has provided vetting checks for.

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

- will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- the organisation sending the professional, such as the Local Authority or Educational Psychology Service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.
The school will follow safeguarding procedures and inform the LADO if there is an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

## Monitoring and evaluation of safeguarding procedures

Any serious child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Governing Body. In addition, the DSL will monitor the operation of this policy and its procedures and will make an annual report to the Governing Body.

The Governors will undertake an annual review of this policy and how their duties under it have been discharged. They will ensure that any deficiencies or weaknesses with regard to child protection arrangements at any time are remedied or reported without delay.

The school will undertake an annual safeguarding review to monitor policy into practice. The findings will be shared with the Governing Body who will ensure that all actions arising from the review are addressed appropriately and in a timely manner.

## Additional safeguarding information

There are three appendices attached to this policy which supplement the information in this policy, they are:

- Appendix 1: Types of abuse and neglect
- Appendix 2: Specific contextual safeguarding issues
- Appendix 3: Documents used to report, record and refer

## Links with other policies

This policy links to the following policies and procedures:

- Anti-bullying
- Artificial Intelligence (if a separate policy)
- Attendance
- Behaviour
- Complaints
- Curriculum
- Dealing with Allegations of Abuse Against Staff
- Exclusions
- First Aid
- Health and Safety
- Induction
- Medication
- E-Safety/Online safety
- Positive Handling
- Privacy Notices
- Risk Management
- Safer Recruitment
- Sex and Relationship Education
- Staff Code of Conduct
- Whistleblowing

# Additional contact information

**NSPCC helplines**

Main contact: 0808 800 5000 (help@nspcc.org.uk)

ChildLine: 0800 1111

FGM direct line: 0800 028 3550

Gangs direct line: 0808 800 5000

Whistleblowing advice line: 0800 028 0285

**Forced Marriage Unit**

0207 008 0151 (fmu@fco.gov.uk)

**Tackling Extremism and Radicalisation (Prevent)**

0207 340 7264 (counter.extremism@education.gsi.gov.uk)

This policy was reviewed and approved by the Governors of The Willows School Academy Trust in September 2026.

**Date reviewed:** September 2026

**Reviewed by:** M. Shaw, Headteacher
Balvier Grant, Chair of Governors, Safeguarding Governor

**The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2026.**

# Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm
Staff should recognise that children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing.

Sexual abuse may also include noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse.

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

Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate 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 2: Specific contextual safeguarding issues*

## Mental Health

All staff should also be aware that mental health problems could, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

School staff are not expected or trained to diagnose mental health conditions or issues but are well placed to observe children day-to-day and may notice behaviours that may be of concern suggesting they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this child protection policy and speaking to the designated safeguarding lead or a deputy.

https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

## Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

**Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made.

To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- contacted by an online account that they do not know but appears to be another child or young person
- quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- moved from a public to a private/E2EE platform
- coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- offered something of value such as money or gaming credits
- threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

**Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated, organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

- use images that have been stolen from the child or young person taken through hacking their account
- use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- quickly engaged in sexually explicit communications which may include the offender sharing an image first
- moved from a public to a private/E2EE platform
- pressured into taking nudes or semi-nudes
- told they have been hacked and they have access to their images, personal information and contacts
- blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

## Children who are absent from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions to help prevent the risks of

going missing in future.

This includes informing the Local Authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the Local Authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

### Child Criminal Exploitation

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage/ increased status of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- suffering from changes in emotional wellbeing
- misusing drugs and alcohol
- going missing for periods of time or regularly coming home late
- regularly missing school or education
- not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

## Child Sexual Exploitation

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

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

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

- having an older boyfriend or girlfriend
- suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

## Potential vulnerabilities

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- having a prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (or parental substance misuse, mental health issues or criminality, for example)
- recent bereavement or loss
- social isolation or social difficulties
- absence of a safe environment to explore sexuality
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other children and young people who are being sexually exploited
- family members or other connections involved in adult sex work
- having a physical or learning disability
- being in care (particularly those in residential care and those with interrupted care histories)
- sexual identity

More information can be found in: Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017)

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line'.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Indicators of criminal exploitation can include a child missing from education or home for periods of time.

If a member of staff suspects involvement in county lines, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team, the police and relevant support agencies, if appropriate.

### Domestic abuse

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

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

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

### Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children.

The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the

police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day.

This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to Operation Encompass will have their own arrangements in place.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).

## National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK Domestic-Abuse: Signs Symptoms Effects
- Refuge: what is domestic violence/effects of domestic violence on children
- Safe Lives: young people and domestic abuse

## Preventing Radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**
  - negate or destroy the fundamental rights and freedoms of others; or
  - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
  - endangers or causes serious violence to a person/people;
  - causes serious damage to property; or
  - seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness at least every two years and make

sure that staff have access to appropriate training to equip them to identify children at risk. This training will be included in the annual safeguarding updates

We will assess the risk of children in our school becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC says that signs that a pupil is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves
- becoming susceptible to conspiracy theories and feelings of persecution
- changes in friendship groups and appearance
- rejecting activities they used to enjoy
- converting to a new religion
- isolating themselves from family and friends
- talking as if from a scripted speech
- an unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use
- expressions of sympathy for extremist ideologies and groups, or justification of their actions
- accessing extremist material online, including on Facebook or Twitter
- possessing extremist literature
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in the 'Roles and Responsibilities' section of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

## Honour-Based Abuse (HBA) (including FGM and forced marriage)

Honour or Faith-Based Abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

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

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

## FGM

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

The 'Roles and Responsibilities' section of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- a pupil confiding in a professional that FGM has taken place
- a mother/family member disclosing that FGM has been carried out
- a family/pupil already being known to social services in relation to other safeguarding issues
- a girl is:
  - having difficulty walking, sitting or standing, or looking uncomfortable
  - finding it hard to sit still for long periods of time (where this was not a problem previously)
  - spending longer than normal in the bathroom or toilet due to difficulties urinating
  - having frequent urinary, menstrual or stomach problems
  - avoiding physical exercise or missing PE
  - being repeatedly absent from school, or absent for a prolonged period
  - demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - being reluctant to undergo any medical examinations
  - asking for help, but not being explicit about the problem
  - talking about pain or discomfort between her legs

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

- the girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl is:
  - having a mother, older sibling or cousin who has undergone FGM
  - having limited level of integration within UK society
  - confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

– talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
– requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
– talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
– being unexpectedly absent from school
– having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

## Forced marriage

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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

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

The DSL will:

- speak to the pupil about the concerns in a secure and private place
- activate the local safeguarding procedures and refer the case to the local authority's designated officer
- seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

## Sexual Harassment and Sexual Violence between children in schools

**Sexual Harassment and Sexual Violence can occur:**

- between 2 children of any age and sex
- through a group of children sexually assaulting or sexually harassing a single child or group of children
- online and face to face (both physically and verbally)

Sexual harassment and sexual violence exist on a continuum and may overlap.

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in 'Roles and Responsibilities' section of this policy.

## Serious violence

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

- increased absence from school
- change in friendships or relationships with older individuals or groups
- significant decline in performance

- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation - see above)

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

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

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

This applies if staff have any concerns a child may be carrying or using a weapon (or expressing intent to do so) – they must also report this to the DSL or DDSL.

## Non-collection of children

If a child is not collected at the end of the school day, they will be accompanied to the school office where the member of SLT (Senior Leadership Team) on late duty will attempt to contact their parents.

The class teacher/teaching assistant should not leave the child unless contact has been made with parents and sufficient staff are on late duty and able to supervise the children who are waiting. In the event that we are unable to contact parents, we will follow the procedure for when children are not collected below.

We abide by the Hillingdon Safeguarding Children's Partnership safeguarding process which has been developed by Headteachers, Social Service representatives, Police and Education Welfare Services within the Local Authority.

## Missing pupils

This protocol refers to pupils who register at school in the morning and then go missing during the school day without a satisfactory explanation.

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

- contact the parents/carers
- engage as many staff as possible in locating the pupil – site search, speaking with the pupil's friends, calling friends' parents, park search, contact other family members
- contact the police

A separate procedure exists for Children Missing Education – see 'Children who are Absent from Education' above. (The Department for Education (DfE) defines a child missing education as a child who is not on a school roll and has been out of education for more

than 4 school weeks. The term Children Missing Education (CME) therefore refers to all children of compulsory school age who are neither registered at a school nor educated otherwise i.e. home educated or privately educated).

**Missing Definition:**
When a pupil's whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of a crime or at risk of harm to themselves or another.

**Is the pupil at significant risk?**
A 'pupil missing during schools hours' incident would be prioritised as significant risk where:

- the risk posed is immediate and there are substantial grounds for believing that the child/young person is in danger through their own vulnerability. Vulnerability characteristics may include;
  - Children on a plan (Early Help, Child in Need, Looked After or Child Protection Plan)
  - SEND
  - Substance misuse
  - Education Health Care Plan
- the risk posed is immediate and there are substantial grounds for believing that the public is in danger.
- there are indications that the child/young person has already come to harm (CSE, grooming, radicalisation etc.)

Other contributory factors should be taken into consideration when determining if the pupil is at significant risk, for example;

- have there been past concerns about this child and family which together with the sudden disappearance are worrying?
- is there any known history of drug or alcohol dependency within the family?
- is there any known history of domestic violence?
- is there concern about the parent/carer's ability to protect the child from harm?
- is this very sudden and unexpected behaviour?
- have there been any past concerns about the child associating with significantly older young people or adults?
- was there any significant incident prior to the child's unexplained absence?
- has the child been a victim of bullying?
- are there health reasons to believe that the child is at risk? e.g., does the child need essential medication or health care?
- was the child noted to be depressed prior to the child's unexplained absence?
- are there religious or cultural reasons to believe that the child is at risk? e.g., rites of passage, female genital mutilation or forced marriage planned for the child?

**Procedure:**
Once a pupil is identified as missing by any member of school staff, the Designated Safeguarding Lead will be informed. Staff will use professional judgement and risk

assess the urgency of the situation to help inform the time frame required in establishing the pupils' whereabouts before notifying the Police.

Timeliness should be on a case-by-case basis. Designated Safeguarding Lead should, together with the class teacher, assess the child's vulnerability. School staff will try to locate the pupil and try to establish the whereabouts of them. School staff will contact home and try to contact the pupil via their mobile telephone if applicable.

**Notifying the Police**
The information required by the Police to assist in locating and returning the pupil to a safe environment is as follows:

- the pupil's name, date of birth, status (for example looked after child); responsible authority
- where and when they went missing
- previous missing episodes and where they went
- who, if anyone, they went missing with
- what the child was wearing plus any belongings they had with them such as bags, phone etc.; include mobile number
- description and recent photograph
- medical history, if relevant
- time and location last seen
- circumstances or events around going missing with relevant safeguarding information
- details of family, friends and associates
- contact details of safeguarding lead if it was after school hours

Whilst the search is ongoing, the school will continue to liaise with the police and act in accordance with police instructions.

**Option 1** – if the child returns before the police have arrived then the Police must be informed and own school procedures need to be followed
**Option 2** - if the child returns to school of their own volition, then the Police must be informed and own school procedures need to be followed
**Option 3** - if the police locate the child and bring them back to the school the Police will conduct the safe and well interview and the school will follow School procedure.
Where a pupil has a known risk of being missing, a risk assessment for the pupil will be written and put into place

## Making or Sharing of Nudes or Semi-Nudes, including AI generated images

This refers to the creation sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content such as photographs videos and live streams.

Images may be taken by the child themselves (self-generated imagery) or taken or

created by another person. They may also be digitally altered or wholly generated using artificial intelligence including what are sometimes described as deep fakes or deep nudes

**Your responsibilities when responding to an incident**
If you are made aware of an incident involving the consensual or non-consensual sharing of nudes or semi-nudes, including those generated using AI, you must report it to the DSL immediately.

**You must NOT**:

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

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

**Informing parents-**Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LADO, the Police and/or the Headteacher before discussing details with parents.

**External agencies-**Whether or not the school decides to refer a particular complaint to children's social care services or the police, the parents and pupil will be informed of their right to make their own complaint or referral to the children's social care services or the child protection unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.

**Curriculum coverage** -Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our SMSC and PSHE programmes as appropriate. Teaching covers the following in relation to the sharing of nudes and semi-nudes, including those generated using AI:

- what it is and how it is most likely to be encountered
- the consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- issues of legality
- the risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images
- the receipt of such images

Teaching follows best practice in delivering safe and effective education, including:

- putting safeguarding first
- approaching from the perspective of the child
- promoting dialogue and understanding
- empowering and enabling children and young people
- never frightening or scare-mongering
- challenging victim-blaming attitudes

For further details please see our SMSC, PSHE, RSE and Curriculum Safeguarding Mapping documents/policies on our website/via school office - available upon request.

## Upskirting

'Upskirting' typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. This offence comes under the Voyeurism (Offences) Act 2019. Anyone of any gender, can be a victim.

## *Appendix 3: Documents used to report, record and refer*

Please reference or attach any school or Local Authority referral documents or reference online reporting systems in use.

The CPOMS electronic secure system is used at The Willows School Academy Trust to record safeguarding concerns. All staff can record concerns but are not able to view safeguarding incidents/concerns. Access to safeguarding information/incidents is restricted to the safeguarding team.

### Safeguarding/MASH referrals are made to the relevant Local Authority:

- **London Borough of Ealing-** Ealing Children's Integrated Response Service (ECIRS) ECIRS is a multi-agency team known as Ealing Multi-agency Safeguarding Hub (MASH). 020 8825 8000.low-level concerns-call the Family Information Service on 0208 825 5588 https://www.ealing.gov.uk/info/201023/children_and_families_social_care/1302/ealing_childrens_integrated_response_service/1
- **Harrow-** Golden Number: 020 8901 2690 between 9am and 5pm, Monday to Friday Emergency Duty Team (operates out of hours): 020 8424 0999 between 5pm and 9am, Monday to Friday, 24 hours during weekends and all bank holidays
- **Hertfordshire-** Children's Services single Consultation Hub for schools - Monday to Thursdays from 9.00am to 5.00pm and Fridays from 9.00 to 4.00pm. Tel: 01438 737511Contacts to Children's Services outside normal Customer Service Centre hours (08.00 - 20-00 Monday - Friday & 09.00 - 16.00 Saturday) are diverted to the Safeguarding Out of Hours Service. Contacts to the Police Joint Child Protection Investigation Team (JCPIT) should be made on 101 (unless it is an emergency then dial 999). The JCPIT normal hours are 08.00 - 22.00 Monday - Friday & 08.00 - 17.00 weekends and Bank Holidays. Any emergency calls outside of these hours should be made via the 999 system
- **London Borough of Hillingdon**- Prevent lead – Fiona Gibbs-Tel: 01895 277035 or 079 4671 4637 E-mail: fgibbs@hillingdon.gov.uk. social care - children (Stronger Families Hub) 01895 556006. LADO designated officer- Hannah Ives 07753431285 E-Mail: hives@hillingdon.gov.uk
- **Surrey**- Phone: 0300 470 9100 (Monday – Friday 9am – 5pm) Out of hours phone: 01483 517898 to speak to our emergency duty team
- **Windsor & Maidenhead –** Contact Single Point of Access (SPA) https://rbwm.afcinfo.org.uk or telephone 016 2868 3150, outside of office hours call emergency duty team on: 013 4435 1999

Referrals to the police are made by phone on 999/101

# Appendix 4: Useful statutory documents and guidance materials

### Statutory Safeguarding Guidance

- Keeping Children Safe in Education 2026 – Department for Education, September 2026
- Working Together to Safeguard Children 2026 – Department for Education, statutory guidance
- Children's Wellbeing and Schools Act 2026 – relevant provisions
- What to do if you're worried a child is being abused: Advice for practitioners – Department for Education
- Prevent duty guidance: England and Wales (2023) – Home Office, updated March 2024
- Channel Duty Guidance: Protecting people susceptible to radicalisation – current version
- Ofsted Positive environments where children can flourish (2018 updated October 2021)
- Children Missing Education: Statutory Guidance for Local Authorities – current version
- Working Together to Improve School Attendance – Department for Education, current version
- Allergy safety in schools: statutory guidance – Department for Education, July 2026
- Crime and Policing Act 2026 – relevant provisions relating to safeguarding and regulated activity
- Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement – Department for Education statutory guidance, effective from 26 July 2026

### Safer Recruitment, DBS & Employment Checks

- Working or volunteering in regulated activity with children – Department for Education, including the guidance on the removal of the supervision exemption from 1 September 2026
- Teacher status checks: information for employers – Department for Education, current version
- Disqualification under the Childcare Act 2006 – current government guidance

### Information sharing, data protection and record keeping

- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers – Department for Education, current version
- UK GDPR, Data Protection Act 2018, and Data (Use and Access) Act 2025
- Data protection guidance for schools – current Department for Education/Information Commissioner's Office guidance, as applicable
- Information Sharing Duty, statutory guidance, Department for Education

### Online safety and technology

- Sharing nudes and semi-nudes: advice for education settings working with children and young people – current UK Council for Internet Safety guidance
- Mobile Phones in Schools – Department for Education, current guidance
- Teaching online safety in schools – Department for Education, statutory guidance effective from 29 June 2026

### Behaviour, bullying and physical intervention

- Behaviour in schools: advice for headteachers and school staff – Department for Education, current version
- Preventing and tackling bullying – Department for Education, current version

- Restrictive interventions, including the use of reasonable force, in schools - Department for Education guidance effective from 1 April 2026
- Searching, screening and confiscation in schools – Department for Education, current version

### Specific safeguarding concerns

- Domestic abuse: statutory guidance – current government guidance
- Multi-agency statutory guidance on female genital mutilation – current version
- Child sexual exploitation and child criminal exploitation guidance – current government guidance
- Criminal exploitation of children and vulnerable adults: county lines – current government guidance
- Modern Slavery: statutory guidance for England and Wales – current version
- Sexual violence and sexual harassment between children in schools and colleges – Department for Education guidance
- Domestic abuse and Operation Encompass – relevant current local and national guidance
- Children with family members in prison – relevant current government guidance
- Preventing youth violence and gang involvement government guidance, Home Office