

Worcestershire County Council Safeguarding Children Policy

**(Including Child Protection) – Adopted by Comberton
Primary School**



September 2026

This policy is reviewed at least annually by the governing body.

Last reviewed on Date: August 2026

Next Review Date: August 2027

Chair of Governors: Jude Bylett

Headteacher and DSL: Deena Frost

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Section 1

This Safeguarding and Child Protection Policy reflects the legal duties, responsibilities and statutory guidance that apply to school/college. It is informed by the Children Act 1989, the Children Act 2004, the Children and Families Act 2014, Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 (where applicable), the Non-Maintained Special Schools (England) Regulations 2015 (where applicable).

[Working together to safeguard children 2026](#) and the Department for Education's statutory guidance, [Keeping children safe in education - GOV.UK 2026](#) and [Children's Wellbeing and Schools Bill 2026](#)

Key Personnel

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Role	Name	Email address	Contact Number
Designated Safeguarding Lead (DSL)	Deena Frost	dfrost@comberton.worcs.sch.uk	01562 754704
Deputy DSL	Jenny Phillips	dfrost@comberton.worcs.sch.uk	01562 754704
Nominated Safeguarding Governor	Fran Orborski	office@comberton.worcs.sch.uk	01562 754704
Headteacher	Deena Frost	dfrost@comberton.worcs.sch.uk	01562 754704
Chair of Governors	Jude Bylett	office@comberton.worcs.sch.uk	01562 754704

Other named staff and contacts:

- Designated Teacher for Children in Care – [Deena Frost](#)
- Online Safety Co-ordinator – Deena Frost
- Safeguarding in Education Adviser, WCC Denise Hannibal
- Family Front Door: **01905 822666** (core working hours)
- Out of hours or at weekends: **01905 768020**
- Prevent Lead: WCC Jim Bayliss

Section 2 Safeguarding is Everyone's Responsibility

This section should be read alongside Annex 2 Recognising and responding to abuse and neglect.

This means safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes into contact with children has a role to play in protecting them from harm for all who work or volunteer in schools consequently, everyone who encounters our children has a role to play in safeguarding and child protection.

Our Staff who work directly with children will read: KCSIE 2026 part 1 and Annex A. Our governing body will also read part 2 about the management of safeguarding.

Comberton Primary School is "a caring community for all to shine".

Our role at Comberton is to spark curiosity, creating a world of opportunity, awe and wonder for our children and staff. We aim to equip our children with the knowledge, skills and values to lead productive, healthy and inspired lives in modern day Britain.

Our vision and values are at the core of everything we do. They underpin our teaching and learning, and provide an environment which enables our children to feel safe and prepares them as confident, happy citizens.

Our core values, supported by the British Values of: <i>democracy; the rule of law; individual liberty; and the mutual respect and tolerance of those with different faiths and beliefs</i> , are:	
Respect	<i>for all members of the school community; for the beliefs and ideas of others and the environment we create.</i>
Responsibility	<i>for our own actions, our own learning, and our pursuit of excellence.</i>
Tolerance	<i>celebrating and understanding differences, and learning from each other.</i>
Collaboration	<i>working together with different people for a common goal.</i>
Perseverance	<i>never, ever giving up. To be the best we can be.</i>
Determination	<i>to do the right thing and wanting to succeed.</i>

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses, but is not limited to, issues such as:

- Staff conduct.
- Health and safety.
- Bullying.
- Child-on-child abuse.
- Sexually harmful behaviour.
- Provision of intimate care.
- Building security.
- Alcohol, drugs, and substance misuse.
- Positive behaviour management.
- Physical intervention and restraint (reasonable force).
- Online safety

All our staff have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below).

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The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines), radicalisation
- consensual and non-consensual making or sharing of nudes or semi nudes.

This policy should be followed and adhered to in all situations and circumstances when the safeguarding of our pupils is at stake. In accordance with the relevant law and guidance, this policy sets out our procedures for safeguarding and child protection. It applies to all school staff, contractors, agency supply staff and volunteers working in our setting. Our school recognises that some children are living in circumstances that may make them more vulnerable to abuse, neglect, or poor outcomes.

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Some may need family help or intervention from other organisations to overcome problems and keep them safe. Special consideration is made for Looked After Children and/or those with Special Educational Needs or Disabilities or wider vulnerabilities.

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We will follow the threshold guidance of [Levels of Need \(Thresholds\) - Worcestershire Safeguarding Boards](#) and implement their systems and protocol for referring families for family help and reporting child protection concerns. DSLs will ensure that all staff are aware of those issues and systems for reporting and provide local safeguarding updates.

Contextualised Safeguarding concerns

In our school we must ask, 'what are we protecting our children from' and consult with the Local Authority, Staff and Pupils for their views. This means that our staff will be made aware of specific issues relating to locality that could impact on the safety of children. We will ensure all staff receive regular safeguarding briefings to keep them up to date and opportunity to share community issues that may impact on our children. This information will also be considered within the curriculum planning of PSHRE.

- [Home | Police.uk](#)

Training

- All staff must complete safeguarding and child protection training as part of their induction.
- All our staff receive annual safeguarding training and regular safeguarding local area updates.
- The DSL team will be appropriately trained and demonstrate attendance at Local Authority and Multi-agency Safeguarding Arrangements meetings.
- The DSL and deputy safeguarding leads will also attend local authority led network meetings and relevant training as per KCSIE 2026 for their required CPD.
- The DSL will share local contextual safeguarding issues through staff briefings.
- Staff will receive training on emerging technologies and associated safeguarding risks, including AI-generated images, deepfakes, online manipulation, impersonation, fraud and technology facilitated abuse. Safeguarding responses will be proportionate to risk and informed by current national guidance

Child Protection and Child Abuse

Child abuse exists where children have been physically or emotionally abused or severely neglected. This abuse can include all aspects of Child Criminal Exploitation including Sexual Exploitation, County Lines and Modern Slavery. Abuse of children who attend our school is likely to be noticed by staff, Health Workers or other professionals who meet our pupils.

[Modern slavery: how to identify and support victims - GOV.UK](#)

The link describes the signs that someone may be a victim of modern slavery, the support available to victims, and the process for determining whether someone is a victim.

It is essential, therefore, that all those whose work **bring** them into contact with children and their families are trained to recognise abuse within families or extra-familial risk.

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This means **that in our school we will all** know the signs of child abuse and are aware of the procedures that we must follow to safeguard the child and any siblings.

Commented [DC6]: all staff will

For those students with additional needs or who identify as LGB, we consider the increased safeguarding issues that can occur and will put in place additional pastoral support and attention, along with ensuring any appropriate support for communication is in place.

Children Questioning Their Gender

The school recognises that some children and young people may question their gender identity, gender expression, or how they relate to societal expectations associated with sex and gender.

We will not initiate discussions or actions relating to social transition. Any considerations in this area will be in response to concerns, requests, or information shared by a child or their parent/carer and will be managed on an individual basis, taking account of the child's welfare, best interests, and relevant statutory guidance.

We recognise that children may express themselves in a variety of ways that do not conform to traditional gender stereotypes. Such behaviour is a normal aspect of child development and does not, in itself, indicate a particular gender identity.

Where a child is questioning their gender, we will respond with sensitivity, respect, and professional curiosity, taking time to understand the child's views, experiences, and circumstances. Consideration should be given to any safeguarding or welfare concerns, including emotional wellbeing, mental health, family relationships, peer interactions, bullying, discrimination, or other vulnerabilities.

We are committed to providing a safe, inclusive, and respectful environment for all pupils. Policies and practices will seek to avoid unnecessary gender stereotyping while ensuring that safeguarding, welfare, and educational needs remain the primary consideration in all decision-making.

Our school has the role of recognising and responding to potential indicators of abuse and neglect, all other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by school.

In the event of an actual or suspected case of child abuse by adults, parents, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as an immediate action. A qualified Designated Safeguarding Lead (DSL) will be available to discuss

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any safeguarding concerns. The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified, and the appropriate agency is involved.

All our staff use a safeguarding system (CPOMs) to record their concerns about a child but will also discuss their concerns with the DSL. The DSL will be a member of school Senior Leadership Team, and the role referenced in their job description.

A Designated Safeguarding Lead or Deputy (DSL or **DDSL**) will always be available during school hours to provide support and advice to staff regarding safeguarding and child protection concerns.

Commented [DC7]: DSL

Wherever possible, the DSL or DDSL will be available in person. However, we recognise that, in exceptional circumstances, availability may be provided through alternative methods such as telephone, Microsoft Teams, or other secure communication platforms. In consultation with the DSL, we will determine what constitutes appropriate availability to ensure that safeguarding concerns can be discussed promptly and effectively.

Appropriate safeguarding cover arrangements will be in place for all out of school hours activities, educational visits, extended services, and activities taking place during school holidays. Effective cover arrangements will be considered and coordinated by the school and the DSL.

To ensure continuity of our safeguarding responsibilities, robust arrangements will be implemented whenever the DSL is unavailable due to illness, annual leave, training, or any other absence. The school has discretion regarding how these arrangements are organised, provided that safeguarding duties continue to be discharged effectively and without interruption.

We will ensure that a clear, reliable, and well communicated process is in place for raising safeguarding concerns when the DSL is unavailable. This may include access to a Deputy DSL, a confidential shared safeguarding mailbox, or another secure reporting system. These arrangements will ensure that safeguarding concerns are received, monitored, and acted upon promptly, without unnecessary delay.

All staff will be informed of the arrangements in place and how to always access safeguarding support, including during periods when the DSL is unavailable.

The Designated Safeguarding Lead (DSL) will attend any reviews called by the Local Authority and may call on appropriate members of staff for reports.

It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation.

Safeguarding and child protection concerns should be considered when planning any off-site or residential visits. In our school a list of those students taking part in any trip will be passed to the Designated Safeguarding Lead (DSL) to ensure that staff are made aware of all essential information relating to the students in their care.

The safeguarding team will meet weekly to confidentially discuss pupils who are identified as vulnerable.

This will be to assess level of support and intervention required and to ensure those most vulnerable are contacted when absence is unauthorised or otherwise agreed as part of a plan or placement. Staff will try all available contact numbers for family members including emergency

contacts. Unanswered calls will be reassessed by the DSL with further discussion with the safeguarding team to consider next steps such as home visit.

Section 3 Our Commitment

In our school, we recognise that because of the day-to-day contact with children, academy staff and volunteers are well placed to observe signs of harm, abuse, neglect, peer-on-peer abuse, victimisation and /or exploitation.

Commented [DC8]: School

We recognise that children with SEND may face additional safeguarding challenges. Staff should be aware that indicators of abuse or neglect may be more difficult to recognise, and communication barriers may increase vulnerability. Staff must remain alert to these risks and ensure that safeguarding arrangements are responsive to individual needs

We recognise that pupils may not be ready to talk about their experiences of abuse, exploitation, or neglect as they do not see this as harmful. Therefore, we will all ensure arrangements are in place to safeguard and promote the welfare of children by:

- Creating a culture of safeguarding by embedding robust policies and procedures where all children feel secure, are encouraged to talk, and are listened to.
- Maintaining a 'Zero Tolerance' to child-on-child abuse, it can happen here culture, including sexually harmful behaviour, racism, and homophobia (*see our anti-bullying policy*)
- Ensure all children know the adults in our school, who they can approach if they have worries.
- Teaching students to keep themselves safe from all forms of abuse, including: child sexual exploitation, criminal exploitation, female genital mutilation [FGM Statutory Guidance](#), forced marriage, extremism, radicalisation [Government Channel Guidance](#), and child-on-child abuse.

And we will support our staff by:

- Providing effective, ongoing training and development for all staff.
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage, including the acceptance of the regulation around mandatory reporting.
- Developing effective links with relevant agencies in all matters regarding safeguarding and child protection, proactively sharing information as early as possible to support pupils and their families.
- Monitoring and supporting children who are subject to child protection plans, contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about children, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely. Records will include:
 - A comprehensive summary of concerns.
 - Details of the concern.
 - What action was taken and any follow-up.
 - Actions taken and outcomes.
- Ensuring the suitability of all staff through safe recruitment practice.
- Ensuring all our staff and volunteers understand their responsibilities with regard to safeguarding and child protection through annual training and CPD training events.

- Ensuring that parents and carers understand the responsibility placed on the school and its staff for safeguarding and child protection.
- Maintaining awareness of those children who are persistently absent or missing from school, notifying the local authority in line with 'Children Missing in Education' protocols.
- Maintaining clear procedures for reporting Low Level Concerns and allegations against staff members.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame.

Our school may be the only stable, secure, and predictable element in the lives of children at risk. Our staff will support all children through:

- Appropriate staff conduct, in line with the policy.
- Relevant curriculum design and implementation to teach pupils about staying safe at all times, including when they are online.
- Daily practice underpinned by our staff, ethos, vision and values.
- Consistent implementation of our school Health & Safety, Anti-bullying, Safer Recruitment, Behaviour and Online safety policies and related practice.
- Close and proactive liaison with other agencies such as social services, Child and Adult Mental Health Service, the Education Welfare and Psychology Services

In line with Government guidelines in KCSIE 2026, our school will, where reasonably possible, holds two or more emergency contact numbers per pupil or student. This provides the school staff with additional options for contacting a responsible adult when a child is missing school and is also identified as a welfare and/or safeguarding concern.

Section 4 Child-on-child abuse (including harassment and violence).

It is important that our staff can recognise that children are capable of abusing their peers, and that this abuse can include physical abuse, sexting, initiation/hazing, sexual violence, and harassment.

Our school values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it will never be tolerated or diminished in significance. The school recognises that child-on-child abuse can affect any child. However, evidence shows that girls are more likely to experience sexual violence and sexual harassment, while boys are more likely to be identified as perpetrators. All concerns will be assessed on an individual basis and without assumptions

Our staff will recognise the impact of sexual violence, and the fact children/young people can, and sometimes do, abuse their peers in this way. It can happen both inside and outside of our school.

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

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes. Schools should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.

- displaying pictures, photos, or drawings of a sexual nature.
- upskirting (this is a criminal offence); and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

When referring to sexual violence this policy refers to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus, or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina, anus, or mouth of another person (B) with a part of her/his body or anything else, the penetration is sexual, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity, and each time activity occurs.

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

Whilst sexting (the consensual and non-consensual sharing of nude and semi-nude images and/or videos) is now common practice within teen relationships, it will be dealt with seriously within our school.

How we will support

- In our school will not tolerate incidences of child-on-child abuse. And will not pass it off as "banter" "just part of growing up" "or "just having a laugh".
- Regardless of if incidences are reported or not, we will lead a culture of "it could happen here."
- All incidences will not be tolerated and will be taken very seriously.
- We will always challenge behaviours which create a hostile, intimidating, or degrading environment.
- We will follow both national and local guidance and policies to support any children/young people subject to child-on- child abuse, including sexting (also known as youth produced sexual imagery) and gang violence. We will also utilise the search and confiscation guidance produced by the DfE. [Searching, screening and confiscation in schools - GOV.UK](#)
- We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.
- We will always report episodes of 'up-skirting':
- Up-skirting is typically defined as 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 the victim humiliation, distress, or alarm.
- We will consider the support required by those falsely accused of child-on-child abuse.

- All disclosures will be taken seriously with those making the disclosure, kept safe, their anonymity protected when appropriate, and ensuring pupils will never be made to feel like they are creating a problem for reporting abuse.
- We will consider taking positive action to support a specific group of children and young people if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. We will ensure staff are aware of how these experiences can impact on a child's mental health, behaviour, attendance and progress at school.

Example

We use the NSPCC Hackett continuum [Understanding sexualised behaviour in children | NSPCC Learning](#) to support our work with students/Pupils.

Section 5 Emotional Health and Well Being and Mental Health Support

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Commented [DC9]: Repeated below

Our school has an important role to play in supporting the mental health and wellbeing of all our learners. This means that in our school we will: Ensure that all of our staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

We will consider the impact of adverse childhood experiences (ACES) and acknowledge that these can have a lasting impact throughout childhood, adolescence and into adulthood.

[Adverse Childhood Experiences \(ACEs\)](#)

As a school, we ensure we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

If our staff feel that a child is in danger, they will call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently with their mental health, but it's not an emergency, our staff can get help from NHS 111 online or call 111 and select the mental health option.

As a school we will be vigilant for signs of emotional well-being concerns. These may include:

- Physical signs of harm that are repeated or appear non-accidental.
- Changes in eating/sleeping habits.
- Increased isolation from friends or family, becoming socially withdrawn.
- Changes in activity and mood.
- Lowering of academic achievement.
- Talking or joking about self-harm or suicide.
- Abusing drugs or alcohol.
- Expressing feelings of failure, uselessness, or loss of hope

We ensure our **pupils** are supported to have the skills and understanding to keep themselves and others physically and mentally healthy and safe. This is part of our PSHRE curriculum.

It is also key that we train our staff to be aware of how these children's experiences can impact on their mental health, behaviour, and education.

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Example

- Content of lessons in our school will be determined by the specific needs of our pupils. There will always be an emphasis on enabling students to develop skills to seek help for themselves and others.
- DSL works with the mental health leads in school to ensure all needs are met.
- DSL will liaise with Children Social Care to ensure that the appropriate approach is taken to safeguarding children most at risk.

Our school staff may become aware of warning signs which indicate a student, or a member of staff, is experiencing mental health or emotional wellbeing issues.

These warning signs should always be taken seriously.

If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action should be taken.

Example

In our school we will work closely with parents and carers to support the whole family, unless to do so places the child at additional risk.

We will provide clear means for parents to contact the Senior Mental Health Lead if they have further questions and arrange a follow-up meeting or phone call as parents often have many questions as they process the information.

To support parents and carers at the end of each meeting we will agree on the next steps and always keep a brief record of the meeting on the child's CPOMS file.

Section 6 Opportunities to Teach Safeguarding

Children are taught about safeguarding in schools. The following areas are among those addressed in PSHRE and in the wider curriculum, including assemblies.

Our school will play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares learners for life in modern Britain. The school promotes a culture of respect and inclusion and teaches pupils about healthy relationships, respectful behaviour, equality, consent, protected characteristics hate focused on LGB issues and sexual violence/harassment, and the impact of harmful stereotypes. This includes challenging misogyny, misandry, sexism and other forms of discriminatory behaviour at the earliest opportunity.

These will be underpinned by the school's Behaviour and Relationships policy and pastoral support system, as well as by a planned programme of evidence-based PSHRE delivered in regularly timetabled lessons and reinforced throughout the whole school curriculum.

Our curriculum delivery will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of our children with SEND and other vulnerabilities) and will stress that law around safeguarding is to protect not criminalise them.

The curriculum will tackle at age-appropriate stages issues such as:

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- **Bullying/Cyber Bullying**

Through our PSHRE curriculum, computing curriculum and National initiatives such as safer internet week, anti-bullying week

- **Drugs, Alcohol and Substance Abuse**

PSHRE curriculum. Including SCARF life education workshops

- **Online Safety / Mobile technologies**

Through our PSHRE curriculum, computing curriculum and National initiatives such as safer internet week

- **Stranger Danger**

Through our PSHRE and computing curriculum and assemblies

- **Fire and Water Safety**

Through PSHRE curriculum, visits from fire officers, swimming teaching

- **Child on Child**

Through our PSHRE curriculum, computing curriculum and National initiatives such as safer internet week, anti-bullying week, United Against Bullying programme

- **Sexual Violence and Sexual Harassment**

Through PSHRE curriculum, NSPCC assemblies and individual/group responsive discussions as appropriate

- **Road Safety**

Through PSHRE curriculum, assemblies, bikeability

- **Domestic Abuse**

Through PSHRE curriculum, NSPCC assemblies

- **Healthy Relationships / Consent**

Through our PSHRE curriculum, computing curriculum, NSPCC and other assemblies

- **Child Exploitation of Children**

Through our PSHRE curriculum

Extremism and Radicalisation (in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). [Promoting fundamental British values through SMSC - GOV.UK](#)

Section 7 Online Safety Filtering and Monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate communications and online material. As such, the school ensures appropriate procedures, filters and monitoring systems are in place in accordance with the following policies:

- **Example**

- Online Safety Policy.
- Acceptable use of Technologies.
- Web Filtering and Device Monitoring.
- Audit of effective filtering through daily filter reports to the DSL.

We recognise that the online risks fall into 4 main categories:

- **content:** being exposed to illegal, inappropriate, or harmful content.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures including how online safety is reflected in other relevant policies. We consider online safety whilst planning the curriculum, any teacher training, the role, and responsibilities of the Designated Safeguarding Lead and engaging with parents to raise awareness in order to support their children.

The designated safeguarding lead will take lead responsibility for online safety and understanding the filtering and monitoring systems in place. All staff will receive appropriate online safety training which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

The DSL will oversee the delivery of the online safety curriculum ensuring safeguarding is maintained.

- Online safety is included our curriculum provision as part of providing a broad and balanced curriculum.
- Our school devices have SENSO installed.
- Children are taught about safeguarding, including online, through teaching and learning opportunities, with specific reference to the age-related guidance.

Technology, and the risks and harm related to it evolve and change rapidly. We will carry out an annual review of our approach to online safety that considers and reflects the risks pupils face. The use of Artificial Intelligence (AI) is a new and developing field and the implications for safeguarding will be closely monitored over the next year and the appropriate response will be led within the school to have the appropriate level of security protection procedures in place to safeguard our systems. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. To support this, we use [National Education Network](#). In addition to this we access support from [Cyber security standards for schools and colleges.GOV.UK](#).

We recognise the emerging safeguarding risks associated with artificial intelligence (AI), including the creation and sharing of AI-generated nude or semi-nude images, deepfakes, and "nudified" images. Such incidents will be treated as safeguarding concerns and responded to in line with the school's child protection procedures.

Mobile Phones

In our school we will ~~be~~ mobile phone-free environment by default; anything other than this should be of an exception only. [Mobile phones in schools - GOV.UK](#)
We ensure our user policy includes that pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Commented [DC10]: be a

Filtering and Monitoring

Our FGB are responsible and need to ensure the limitation of children's exposure to the above risks from the school's IT system. Our FGB ensure our school has appropriate filters and monitoring systems in place and regularly review their effectiveness. Through training in line with KCSIE 2026, the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. We also consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.

In our school we monitor the results of our web blocking and monitoring software to ensure that our students work safely and are protected from terrorist or extremist material, cyber-bullying, cyber-crime, sexting, offensive user/trolling, vulnerable user over sharing and grooming.

We will follow the DfE filtering and monitoring standards to:

- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

Example

We meet the Government Cyber security standards for schools and colleges identifying and assigning roles and responsibilities for filtering and monitoring.

We also ensure that all staff:

- understand their role.
- are appropriately trained.
- Follow policies, processes and procedures.
- act on reports and concerns.
- DSL reviews standards and discuss with IT staff or service providers what more needs to be done to support us in meeting the required standards.
- All staff will work to clear guidance ensuring safe and effective online learning.
- Our school is committed to keeping our pupils safe online so we will include the safe use of mobile phones within our curriculum.

Section 8 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

This section should be read alongside KCSIE 2026 pages 12-19 [Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#)

Criminal Exploitation Child Criminal Exploitation is a coverall heading for the following issues:

- Child Sexual Exploitation.
- County Lines.
- Child Trafficking & Human Slavery.
- Financial exploitation.

We will view children (0-18 years) as victims of Child Criminal Exploitation and not as perpetrators and will advocate for our students to be viewed as children in all circumstances, avoiding the adultification of our older teenage students.

Child Sexual Exploitation (CSE) CSE involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It is a problem that occurs for boys as well as girls.

Sexual exploitation CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be

committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with **CCE**, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Commented [DC11]: should this be CSE?

County Lines Gangs use children and vulnerable people to move drugs and money. Gangs establish a base, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing.' One of the key factors found in most cases of County Lines is the presence of some form of exchange (e.g., carrying drugs in return for something). Where it is the victim who is offered, promised, or given something they need or want, the exchange can include both tangible (such as money, drugs, or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). If staff suspect that a child is a victim of County Lines exploitation, they must follow the school procedures for reporting child protection concerns and report to the DSL immediately. The DSL should refer to the Worcestershire levels of needs guidance to assess whether a referral to Worcestershire County Council family front door is required. Additionally, to this to seek to complete a GET SAFE risk assessment [Get Safe | Worcestershire County Council](#) immediately and share any further intel with West Mercia police.

Serious Violence

Please read alongside Annex B of this policy (how to make a referral)

Serious violence is a safeguarding concern that may involve physical assault, carrying, threatening with, or using weapons, and may be linked to peer conflict, bullying, criminal exploitation, gangs, or county lines activity.

All our staff are aware of the indicators that a child may be at risk of, or involved in, serious violence. These indicators may include an increase in absences, changes in behaviour or peer relationships, a decline in educational performance, unexplained injuries, possession of weapons, involvement in criminal activity, or signs of exploitation. Children with disrupted education, including those who have experienced suspension, exclusion, or placement in alternative provision, may be at increased risk.

Any concerns that a child is carrying a weapon, has used a weapon, or has expressed an intention to do so must be reported immediately to the Designated Safeguarding Lead (DSL) or a deputy. The DSL will assess the level of risk to the child and others, gather relevant information, and take appropriate action in line with local safeguarding procedures. This may include the development of a safety and support plan, engagement with parents/carers, referrals to external agencies, and where necessary, contacting the police.

We recognise the importance of early intervention and will work with partner agencies to provide timely support for children who are affected by or at risk of serious violence. Support may include access to trusted adults, mentoring, emotional wellbeing support, and targeted interventions to reduce risk and promote positive outcomes.

Child Trafficking & Human Slavery

Our school will ensure we keep up to date with the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation and access support, advice, and resources via GET SAFE, Worcestershire County council multi agency exploitation team.

Children Missing from Education

Our school will inform the local authority where a child or young people is missing from education. We will provide information to the local authority when removing a child from school roll as per local Worcestershire County Council and statutory guidance:

- [Statutory guidance children missing in education](#)
- [Attendance and Children Missing Education \(CME\) | Worcestershire County Council](#)

Elective Home Educated

We will inform Worcestershire County Council of all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work together to coordinate a meeting with parents/carers where possible.

Homestay Exchange Visits School

Arranged Homestays in UK. Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults. Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household. School-arranged

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Homestays Abroad

The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately Arranged Homestays Where a parent or pupil arranges their own homestay, this is a private arrangement, and the school is not the regulated activity provider.

Violence against women and girls including Honour-Based abuse (including Female Genital Mutilation and Forced Marriage)

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www.worcestershire.gov.uk

We recognise the links between violence against women and girls, misogyny, harmful sexual behaviour, sexual harassment, sexual violence, online abuse and coercive behaviour. Preventative education, early identification and proportionate intervention form part of our whole school safeguarding approach

Where HBA affects children and young people it is a child protection issue. It is an abuse of human rights.

Children and young people who suffer Honour Based Abuse are at risk of Significant Harm through physical, sexual, psychological, emotional harm and neglect. In some cases, they are also at risk of being killed. Some reasons that have been given for HBA are:

- Protecting family 'honour' To control un-wanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual, or transgender).
- Strengthening family links.
- Protecting perceived cultural and/or religious ideals.
- Preventing unsuitable relationships. • Assisting claims for residence and citizenship in the UK.
- Perceived immoral behaviour e.g., make-up or dress; use of mobile phone; inter faith relationships.

Our staff in school have received appropriate training and where we identify HBV the DSL will refer to Children's Social Care, the Police, and the National Forced Marriage Unit promptly.

[The right to choose: gov guidance on forced marriage](#)

FGM mandatory reporting duty for teachers

FGM is a criminal offence – it is child abuse and a form of violence against women and girls and therefore should be treated as such. With effect from October 2015, all schools are subject to a **This** means that in our school we ensure:

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Our staff are supported by talking to families and local communities about sensitive concerns in relation to their children and finding ways to address them together wherever possible. All staff are up to date with the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation. mandatory reporting requirement in respect of female genital mutilation (FGM).

FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. Four types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris.
- Type 2 Excision – partial/total removal of clitoris and labia minora.
- Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia.
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising, and scraping the genital area.

When a teacher suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, that teacher has a statutory duty to report it to the Police. Failure to report such cases MAY result in disciplinary sanctions.

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Forced Marriage

Staff in our school understand we could potentially play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), of which focus on the role of schools and colleges. Our staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence threats or another form of coercion is not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Section 9 Domestic Abuse

We recognise that domestic abuse can encompass a range of behaviours including physical, emotional, psychological, sexual, financial and coercive or controlling behaviour. Children who see, hear, experience or are otherwise affected by domestic abuse are recognised as victims in their own right and may experience significant short- and long-term impacts on their health, wellbeing, development, attendance and educational outcomes.

We will be alert to indicators of domestic abuse and will respond to concerns in accordance with safeguarding procedures. Staff remain vigilant to the impact of domestic abuse on children and recognise that abuse within families may also include child-to-parent or caregiver abuse.

We are committed to working with safeguarding partners and relevant agencies to provide timely support and intervention for children affected by domestic abuse. Information will be shared appropriately, proportionately and securely in line with safeguarding responsibilities and data protection requirements.

As part of our safeguarding arrangements, we participate in Operation Encompass and recognises the statutory requirement for police to share information with educational settings where a child may have been affected by a domestic abuse incident. This enables early support to be provided to children who may be vulnerable because of their experiences.

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse, and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic

abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

MARAC

If we identify a victim of domestic abuse being high risk. We will consider a referral to MARAC (Multi Agency Risk Assessment Conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults, and the management of offenders. We will continue to provide help and support to safeguard children. This will usually be led by the designated safeguarding lead. MARAC does not replace a referral to children's social care.

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Operation Encompass

In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities.

In our school we receive Operation Encompass Notifications including any reported to our Operation Encompass highlights that a Domestic Abuse Incident has taken place, and the police have been called. As part of the support, we then offer to follow these notifications, we ensure that staff keep a close eye on the child, informing the DSL of any changes with regards to their behaviour, and reporting and recording anything out of the ordinary.

Operation Encompass is working well in Worcestershire Schools and Worcestershire County Council successfully send DA notifications to schools. 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, they inform Worcestershire County Council, who then inform the school (usually the Designated Safeguarding Lead) before the child or children arrive at school the following day. This information sharing ensures relevant information about the child's circumstances are received in a timely manner and therefore as a school we enable support to be given to the child according to their needs.

[Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass](#)

Section 10 Safeguarding Pupils who are at risk of extremism

The Prevent strategy aims to stop people becoming terrorists or supporting terrorism. While it remains rare for children to become involved in terrorist activity, our school recognises some, from an early age can be exposed to terrorist & extremist influences or prejudiced views.

As with other forms of safeguarding strategies, early intervention is always preferable. We are committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of:

- **Extremism** – such as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** – such as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** – defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

All staff are alert to changes in children's behaviour which could indicate that they may need help or protection.

We know children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from harm. As part of our whole safeguarding approach, we include and consider the following.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Staff will use the Prevent risk assessment and their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. When any member of our staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Lead (If there is a concern that a young person is being radicalised or at risk of being drawn into terrorism refer to Children's Services as with any other safeguarding concern. person) and record their concerns on your school safeguarding systems. In addition, links with the local Channel lead can be made by the DSL and where necessary, individual cases will be referred to the local Channel Panel [Channel guidance](#), for screening and assessment. We will ensure that the DSL will complete local training on the locality risks, and these will be cascaded with our school staff.

In our school this will be part of our annual CPD training programme by the DSL. Due diligence checks should be undertaken by the school or any organisation that uses its facilities. These checks will include:

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff are alert to changes in children's behaviour, which could indicate that they may be in need of

help or protection. Staff use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral.

Section 11 Allegations Against Staff members and Low-Level Concerns

All our staff are aware of their duty to raise concerns where they exist about the attitude or actions of colleagues, using the school's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Where the Headteacher is also the sole proprietor, concerns should be reported directly to the Local Authority Designated Officer (LADO). Statutory guidance contains further information on: [The Role and Responsibilities of the Designated Teacher](#).

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then this should be referred to the headteacher or principal.

Details of your local LADO are available on this link [Refer to Children's Social Care | Worcestershire County Council](#). If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy.

Low Level Concerns

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

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

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

Section 12 Safer Recruitment

Safer recruitment practices are **essential** part of creating a safe environment for children and young people. We will-

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- Not allocate start dates **new** members of staff until all employment checks have been completed.
- We will keep Copies of documents used to verify the successful candidate's identity, right to work and required qualifications in staff personnel files.

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We will ensure that staff and volunteers working at in our school are suitable to do so as outlined in our recruitment policy and this will include online searches for shortlisted candidates As KCSIE 2026 requires we will complete risk assessments for all volunteers working in our school. Where a volunteer is working in regulated activity, we will require a DBS including barred check.

The school will undertake appropriate checks and risk assessments for contractors and agency workers to ensure that safeguarding requirements are met before unsupervised access to children is permitted

Where a volunteer isn't working in regulated activity, we will require DBS not including barred list check. We will assess volunteer roles carefully to determine the appropriate level of vetting and DBS checks required, including Enhanced DBS checks with Children's Barred List information where eligibility criteria are met. We will ensure that no individual who is barred from working with children undertakes regulated activity with children.

- Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.
- Right to work documents will be kept for two years following the date they left our school but will then be destroyed after the two years. This is as per guidance set out in KCSIE 2026.

Single Central Record

The Single Central Record (SCR) is an important part of our **school** are commitment to safeguarding and will be maintained by a member of the office management team.

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All pre-appointment checks are recorded on the school SCR template and are audited on a regular basis.

Any people accessing our school site will be authorised to do so as follows:

It is expected that all staff, visitors, and contractors will:

- Report to reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times with lanyards differentiating the groups:
- staff will use the designated lanyard.
- Visitors whose DBS Status has been confirmed will wear lanyards and may be allowed to access the school unsupervised.
- Visitors who do not have a DBS or has not had confirmation will wear a red visitor lanyard and will be supervised on-site.

- Be made aware of the arrangements for safeguarding, health and safety.

Section 13 Confidentiality and Record Keeping

Staff, volunteers, and contractors have the responsibility to share relevant information about the protection of children with the DSL, Head of school and potentially external investigating agencies. We take all disclosures very seriously.

Information sharing is essential for effective safeguarding. Fears about sharing information must not stand in the way of protecting children. Decisions about information sharing will be made in line with statutory guidance, UK GDPR and data protection legislation

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tell the student sensitively that they have a responsibility to refer the matter to the Designated Safeguarding Lead (DSL) for the student's own sake. We will seek to reassure our students that the matter will only be disclosed to the Designated Safeguarding Lead (DSL), who will then decide on appropriate action. At no time should a staff member promise total confidentiality.

Accurate written notes will be kept of all incidents or Child Protection concerns relating to individual pupils. If a staff member has a safeguarding or child protection concern, they must inform the DSL as soon as possible.

Any external organisation or contractor working in our school is expected to work in accordance with our safeguarding child protection policy. This will be shared upon working with us. Any external individual must report safeguarding concerns to the DSL.

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Working in partnership with parents is important, we will endeavor to always do this. It is recognised however that there are occasions when it is in the child's best interest for work to be undertaken and referrals made without the parents' initial consent to ensure the welfare and safety of our students.

We will:

- *Aim to help parents understand that we have a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the best interests of the student.*
- *Consider the safety of the student and, should a concern arise, DSL has the responsibility to seek advice prior to contacting parents.*
- *Make all our policies available on the website and on request.*
- *Ensure a robust complaints system is in place to deal with issues raised by parents and carers.*

Provide advice and signpost parents and carers to other services where pupils need extra support. We will do this by ensuring our *Supporting Families offer is up to date and available on our school website.*

Our child protection records will be stored securely and in line with the latest data protection policy.

All safeguarding files will be kept separately from individual student records and stored securely. Information in these files will only be shared with relevant staff when it is necessary consistent with data protection.

We will release information, including police, on receipt of the appropriate documentation in-line with data sharing laws. Upon receipt of any request the DSL/Head teacher will be informed and a decision on an appropriate way forward in line with data protection will be made.

When pupils transfer to another school, child protection and safeguarding information will be shared with that school to ensure safe and consistent support for that child or young person.

We will ensure the new school will sign a document to say they are in receipt of the safeguarding and child protection file. We will keep this on file until the child or young person's 25TH birth year.

Updated June 2026 [Data protection in schools - Guidance - GOV.UK](#)

Section 14 Early years Setting within our school (Only add this section if your school has Early years)

[Early years foundation stage \(EYFS\) statutory framework - GOV.UK](#)

All staff working within the Early Years Foundation Stage will read and be familiar with the EYFS Statutory Framework and the safeguarding and welfare requirements relevant to their role." Alongside KCSIE 2026.

As an early year's provider delivering the Early Years Foundation Stage (EYFS), our aim is to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance. We will do this by:

Ensuring we have a safe secure learning environment where children can be seen and always heard.

- A named member of staff in the DSL team.
- A member of staff who always holds a current **paediatric** first aid qualification and available.
- We will liaise with parents and carers supporting their child's development.
- Routine monitoring of health and safety practices to promote children's safety and welfare.
- Appropriate staff, ratios, and qualifications comply with statutory guidance meeting the needs of all children.

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We will promote the health of all children and young people including early years by –

- Taking necessary steps to prevent spread of infection.
- Administering medicines and/or intimate care is in line with our policies.
- Taking appropriate action where children / young children, including early years, are unwell.

Section 15 Our Responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

We are committed to creating a culture where children feel safe, listened to, and taken seriously. We actively seek to understand and consider students' wishes and feelings in all aspects of safeguarding and child protection. Staff are trained to listen to children attentively and respectfully, recognising the importance of what they say - verbally or through behaviour. The DSL ensures that children's voices are considered when making decisions that affect their safety, wellbeing, and support, in line with statutory guidance. Safeguarding teams are trained to gather child voice, wishes and feelings using a range of direct work tools. Where appropriate, these views of the child will be used to inform referrals, plans, and interventions, while always maintaining a focus on their best interests and welfare.

Knowing what to look for is vital to the early identification of abuse and neglect and if staff are unsure, they should always speak to the designated safeguarding lead or deputy – if in exceptional circumstances, the designated safeguarding lead (or deputy lead) is not available, staff should consider speaking to a member of the SLT or contacting the local Children's Social Care Team. All actions that are completed in the absence of a designated safeguarding person should be shared with them at the very earliest opportunity.

The Governing Body will determine and keep under review safeguarding policy and practice in our school.

All staff working (including visiting staff) must:

- Observe and comply with the staff code of conduct.
- Attend all relevant training and development provided by *Comberton Primary School*.
- Induction training must include safeguarding training.
- Staff working directly with children will read KCSIE 26 Part 1, Annex A.
- Staff who do not work directly with children will read KCSIE 26 Part 1
- Know how to deal with a disclosure; if a pupil discloses to a member of staff that they are being abused, the staff member should refer to this policy and procedures in place) and follow guidance set out in this policy.
- Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy DSL. This is in line with the Child Protection Procedures and legal duty for reporting FGM.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to child-on-child abuse. This is most likely to include but not limited to: bullying (including cyber bullying), child-on-child abuse and gender-based violence/sexual assaults and sexting.
- Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.
- Staff recognise that in exceptional circumstances physical intervention may be necessary to prevent the pupil from causing injury to themselves others, committing a criminal offence or damaging property- [Use of reasonable force and other restrictive interventions guidance](#)
- Any child may benefit from family help, but all school and college staff should be particularly alert to the potential need for family help for a child who:
 - is disabled and has specific additional needs.
 - mental health concerns.

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- has special educational needs (whether they have a statutory education, health and care plan).
- anti-social or criminal behaviour.
- is a young carer.
- is frequently missing/goes missing from care or home.
- is misusing drugs or alcohol.
- risk of radicalisation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has returned home to their family from care.
- All staff must be aware of the family help process; this includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking a family help assessment. All family help cases should be reviewed regularly and if the situation is not improving then consideration should be given to a referral to children's social care for assessment for statutory services.

The Safeguarding Team responsibilities

Through the DSL team ensure that:

- All staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns and can make appropriate referrals, including to family help services.
- Encourage a culture of listening to children considering their wishes and feelings, making the most of every opportunity to gather their concerns.
- Promote the educational outcomes and track the progress and attainment of all the vulnerable children, but specifically 'those in need of a social worker' or **were** previously known to social services.
- Deliver a common approach to behaviour through the policy principles.
- All staff and volunteers are trained sufficiently so they have the skills, knowledge and understanding necessary to always keep children safe, including on site, when attending alternative provision, educational visits off site or work-related learning. We follow the guidance on Keeping Children Safe in Out-Of-School Settings which details the safeguarding arrangements that schools and colleges should expect providers to have in place.
- Ensure that the KCSIE 2026 guidelines for effectively managing SEND and safeguarding are in place including the 2026 updates to this area.

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Appoint a designated teacher to promote the educational achievement and welfare of children who are looked after and previously looked after children, those with additional SEN needs.

- Ensure that there is a deputy DSL in place to add capacity and ensure sustainable provision.
- Ensure consideration to the range of responsibilities the DSL undertakes e.g.; the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff areas, the staff handbook and website (along with this policy).

- Ensure safe recruitment practice is followed when recruiting to posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- Ensure our school offers a safe environment through effective implementation of the school health and safety policy to meet the statutory responsibilities for the safety of students and staff at the academy.

The Designated Safeguarding Lead is responsible for:

- Maintaining both a strategic and operational approach to safeguarding.
- Being available term time during school hours (or the deputy DSL in their absence) for staff or volunteers to discuss any safeguarding concerns.
- Ensuring that all cases of suspected or actual problems associated with child protection are referred to the appropriate agencies in line with procedures set out in this policy, keeping the head teacher appraised.
- Ensuring the school safeguarding policy and practice is relevant and consistent with the most recent statutory guidance.
- Being aware of the latest national and local guidance and requirements and keeping the head teacher and staff informed as appropriate.
- Attend accredited, enhanced training as defined by the school Safeguarding Arrangements to fulfil the role every two years.
- Complete the school safeguarding training is enrolled by all.
- Ensuring that appropriate training for staff is organised according to the agreed programme with the head teacher and renewed through ongoing professional development.
- Ensuring families are fully aware of our schools safeguarding policies and procedures and kept informed and involved.
- Keeping Children Safe in Education 2026 says that where reasonable possible, schools should hold more than one contact number for every child in the school in case of emergencies, and in case there are welfare concerns at home. The DSL is responsible for ensuring this is in place.
- Ensuring that effective communication and liaison take place between the school and the Local Authority, and any other relevant agencies, where there is a Safeguarding concern in relation to an academy student.
- Ensuring that all staff understand child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs (SEN) and disabilities and being cognisant of the additional safeguarding concerns that can arise.
- Maintaining details of any looked after child's social worker and the name of the virtual school head (in the authority that looks after the child).
- Working with the Designated Teacher to ensure that the Virtual School Head delivers funding that can be best used to support the progress of looked after children at the academy and meet the needs identified in the child's personal education plan.
- We recognise that children who currently have, or have previously had, a social worker are more likely to experience safeguarding and educational challenges. Staff will ensure that concerns regarding attendance, welfare, engagement, wellbeing, or presentation are identified early, shared appropriately. We will work closely with social care professionals and the Virtual School to promote educational outcomes and wellbeing
- Ensuring that online-safety actions promote safeguarding, including taking the lead responsibility for online safety and understanding the filtering and monitoring systems in place.
- Liaison with the Senior Mental Health Lead, and the local Mental Health Services as appropriate.

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- Dealing with allegations of abuse in accordance with local and statutory procedures.
- Have an awareness of the requirements around the role of the Responsible Adult under PACE requirements.
- Supporting the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate if family help is appropriate.
- Ensuring that adequate reporting and recording systems are in place.
- Ensuring relevant records are passed on appropriately when students transfer to other schools or are being educated at alternative provision or off-site education.
- Being aware of children who are or who may be living in a private fostering arrangement informing the local authority where required to support the welfare and safety of the child.
- Providing guidance and advice on the management of child-on-child sexual abuse incidents.
- Tracking the progress, attainment and aspirations of children known and previously known to social care.
- Ensuring accurate vulnerability recording within safeguarding files and submission of safeguarding data as required.

The Designated and Deputy Safeguarding Lead will meet regularly with the rest of the safeguarding leadership team to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work, including where the DSL has acted as a 'Responsible Adult' under PACE legislation. These meetings must be evidenced by minutes added to our safeguarding files. Other key staff will be invited as appropriate.

Section 16 Statutory Requirements

This policy has been developed in line with the following Statutory key documents:

- Home Office (2023) ['Prevent duty guidance: Guidance for specified authorities in England and Wales'](#)
- DfE (2026) ['Working together to safeguard children 2026'](#)
- DfE (2018) ['Disqualification under the Childcare Act 2006'](#)
- DfE ['Keeping children safe in education 2026 \(comes into force from 1 September 2026\)'](#)
- DfE (2026) ['Working together to improve school attendance: July 2026'](#)
- HM Government (2020) ['Multi-agency statutory guidance on female genital mutilation'](#)
- HM Government (2025) ['Channel Duty Guidance: Protecting people susceptible to radicalisation'](#)
- Home Office and Foreign, Commonwealth and Development Office (2023) ['Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'](#)

Other non-statutory Guidance

- DfE ['What to do if you're worried a child is being abused'](#)
- DfE ['Child sexual exploitation'](#)
- DfE ['Information sharing'](#)
- DfE ['Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#)
- DfE ['Teachers' Standards'](#)
- DfE ['Recruit teachers from overseas'](#)

- DfE ['Working together to improve school attendance'](#)
- DfE ['Meeting digital and technology standards in schools and colleges'](#)

Appendix 1 Child-on-child abuse (including harassment and violence)

1. Purpose

This appendix should be read alongside the school's Child Protection and Safeguarding Policy, Behaviour Policy, Online Safety Policy, Staff Code of Conduct and Keeping Children Safe in Education (KCSIE) 2026.

The school recognises that children can abuse other children (child-on-child abuse) and that it can occur both inside and outside of school, online and offline. All staff should maintain the attitude that "it could happen here." Child-on-child abuse is a safeguarding issue and must never be tolerated, passed off as banter, part of growing up, harmless fun, or dismissed as "boys being boys."

The school adopts a zero-tolerance approach to abuse, prejudice, discrimination, sexual violence, and sexual harassment.

2. Definition

For the purposes of this policy, child-on-child abuse is any form of physical, sexual, emotional, or online abuse, exploitation, coercion, harmful behaviour, or violence carried out by one child towards another child.

Child-on-child abuse can include, but is not limited to:

- Bullying, including cyberbullying and prejudice-based bullying.
- Physical abuse.
- Emotional abuse.
- Abuse within intimate personal relationships.
- Sexual violence.
- Sexual harassment.
- Harmful sexual behaviour.
- Consensual and non-consensual sharing of nude and semi-nude images.
- Upskirting.
- Initiation, hazing or ritual-type violence.
- Child criminal exploitation.
- Child sexual exploitation.
- Online abuse.
- AI-generated nude and semi-nude imagery.
- Image-based abuse and sextortion.

3. Whole-School Approach

We believe that safeguarding is everyone's responsibility.

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The school will:

- Create a culture where abuse is not tolerated.
- Ensure children know how to report concerns.
- Take all reports seriously.
- Support victims.
- Address inappropriate behaviour promptly.
- Provide effective RSHE and safeguarding education.
- Work collaboratively with parents, carers, and external agencies where appropriate.

4. Prevention

We are committed to preventing child-on-child abuse through a whole-school approach to safeguarding. We will promote a culture of respect, inclusion, and positive relationships where all pupils feel safe, valued, and able to report concerns.

Prevention strategies include:

- Delivering an appropriate age curriculum, including RSHE and online safety, which teaches pupils about healthy relationships, consent, boundaries, respectful behaviour and how to seek help.
- Challenging inappropriate language, attitudes, behaviours, and stereotypes.
- Providing education on sexual harassment, sexual violence, harmful sexual behaviour, image sharing, sextortion, and AI-generated sexual imagery.
- Ensuring pupils know how to report concerns and access support.
- Providing regular safeguarding training for staff to enable early identification and intervention.
- Working in partnership with parents, carers, and external agencies to promote pupil safety and wellbeing
- We will regularly review safeguarding information, pupil voice, and incident data to identify emerging risks and strengthen preventative practice.
- Resources we will refer to [Addressing child-on-child abuse: a resource for schools and colleges](#)

5. Child-on-Child Sexual Violence and Sexual Harassment

We recognise that sexual violence and sexual harassment can occur between children of any age and sex.

These behaviours can occur:

- Face-to-face.
- Online.
- Individually.
- Within groups.
- Between pupils who know each other.
- Between pupils who do not know each other.

Sexual Violence

Sexual violence refers to sexual offences under the [Sexual Offences Act 2003](#) and includes:

- Rape.
- Assault by penetration.
- Sexual assault.
- Causing someone to engage in sexual activity without consent.

Sexual Harassment

Sexual harassment may include:

- Sexual comments.
- Sexual jokes.
- Sexualised remarks.
- Displaying sexual pictures.
- Deliberately touching another person in a sexual manner.
- Online sexual harassment.
- Sharing sexual images.
- Sexualised online communication.
- Non-consensual image sharing.

We will respond to incidents proportionately whilst recognising that all victims deserve to be heard, supported, and protected.

6. Hackett Continuum and Harmful Sexual Behaviour

The school recognises that children display a range of sexual behaviours and that not all sexual behaviour is harmful.

When considering concerns involving sexualised behaviour, the DSL may use the Hackett Continuum of Sexual Behaviour [Understanding sexualised behaviour in children | NSPCC Learning](#) and other recognised assessment tools to support professional judgement.

Normal Behaviour

Developmentally expected behaviours that are:

- Age-appropriate.
- Consensual.
- Mutual.
- Exploratory.
- Occurring between children of a similar age and developmental level.

Such behaviour will generally require education, supervision, and support that we will revisit within our curriculum.

Inappropriate Behaviour

Behaviour that falls outside developmental expectations but is generally isolated and not characterised by coercion, intimidation, or exploitation.

Such behaviour may require:

- Education.
- Restorative work.
- Behaviour support.
- Monitoring.

Problematic Behaviour

Behaviour that is developmentally concerning and may indicate a need for safeguarding intervention.

Indicators may include:

- Repetition.
- Lack of responsiveness to previous intervention.
- Emerging power imbalance.
- Distress caused to others.

The DSL should be informed and a safeguarding assessment undertaken.

Abusive Behaviour

Behaviour characterised by:

- Coercion.
- Threats.
- Force.
- Exploitation.
- Significant power imbalance.
- Lack of consent.

Such behaviour constitutes a safeguarding concern and may require referral to Children's Social Care and/or the Police.

The continuum will be used to support assessment and intervention, but professional safeguarding judgement will always take precedence.

7. Sharing Nudes and Semi-Nudes

We will respond to incidents involving the sharing of nude or semi-nude images in accordance with national guidance and safeguarding procedures.

Staff must not:

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- Print images.
- Copy images.
- Share images.
- Forward images.
- Save images to personal devices.

Staff should immediately report concerns to the DSL.

The welfare of the child will remain the primary consideration when determining the most appropriate response.

8. AI-Generated Nude and Semi-Nude Images

We recognise increasing safeguarding risks arising from Artificial Intelligence (AI), including:

- Deepfake imagery.
- Nudify applications.
- AI-generated sexual content.
- AI-enabled sextortion.
- AI-generated child sexual abuse material.

The creation, possession or sharing of AI-generated nude or semi-nude images involving children may constitute a criminal offence and can cause significant emotional and psychological harm. Such incidents will be treated with the same level of concern and safeguarding response as any other child sexual abuse imagery incident.

The DSL will assess:

- The nature of the incident.
- Level of harm.
- Consent.
- Coercion or exploitation.
- Distribution of material.
- Ongoing risks to any child involved.

Appropriate referrals will be made where necessary.

9. Responding to Reports

All reports of child-on-child abuse will be:

- Taken seriously.
- Recorded promptly.
- Investigated proportionately.
- Managed sensitively.
- Referred to the DSL without delay.

Our response will be guided by:

- The wishes of the victim.
- The safety and welfare of all children involved.
- The nature and seriousness of the incident.
- Advice from Children's Social Care, Police, and other agencies where appropriate.

10. Supporting Victims

We understand that children who have experienced abuse may find the process difficult and distressing.

Victims will be:

- Listened to.
- Reassured.
- Protected from further harm.
- Offered appropriate pastoral support.
- Kept informed of safeguarding actions where appropriate.

The school will do all that is reasonably possible to protect victims and ensure they receive ongoing support.

11. Recording, Monitoring and Review

The DSL will ensure that:

- All incidents are accurately recorded.
- Risk assessments are undertaken where required.
- Actions and outcomes are monitored.
- Patterns and trends are identified.
- Preventative actions are implemented.

Governors will receive regular safeguarding reports, monitoring information and audit outcomes to provide assurance that safeguarding arrangements remain effective.

12. Partnership with Parents and Carers

We recognise that parents and carers play a vital role in promoting positive relationships and safeguarding children. We are committed to working in partnership with parents and carers to prevent child-on-child abuse and to support children where concerns arise.

Where appropriate, we will inform and involve parents and carers in the management of child-on-child abuse incidents, whilst balancing this with the need to safeguard all children involved and any advice received from external agencies.

We will support parents and carers by:

- Providing information on child-on-child abuse, healthy relationships, consent, and online safety.
- Raising awareness of emerging risks, including online sexual harassment, image-based abuse, sextortion, and AI-generated nude or semi-nude images.
- Promoting clear reporting pathways for safeguarding concerns.
- Working collaboratively to support children who have experienced abuse, displayed harmful behaviour, or who may be vulnerable to harm.
- Signposting families to appropriate support services where required.

Parents and carers are encouraged to share concerns with the school at the earliest opportunity so that appropriate support and intervention can be provided. Through effective partnership working, the school aims to promote the safety, wellbeing, and welfare of all pupils.

[What is harmful sexual behaviour - Lucy Faithfull Foundation](#) designed for parents, carers, family members, and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

Support for victims [Anti-Bullying Alliance](#) Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

[Rape Crisis England & Wales](#) Provides and signposts to a range of services to support people who have experienced rape, child abuse, or any kind of sexual violence.

[The Survivors Trust - Rape & Sexual Abuse Services UK](#) UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence, and child sex abuse.

[Home - Victim Support](#) Supporting children and young people who have been affected by 178 crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

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The welfare of the child will always be the school's paramount consideration.

Appendix 2: Recognising and Responding to Abuse and Neglect

1. Purpose

All staff have a responsibility to safeguard and promote the welfare of children. Staff should be alert to signs of abuse, neglect and exploitation and understand that children may be at risk of harm both inside and outside the home, online and offline. Any concerns about a child's welfare must be reported immediately to the Designated Safeguarding Lead (DSL) or a deputy. Safeguarding concerns should never be ignored.

A child may:

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- Disclose abuse directly.
- Show physical signs of abuse.
- Demonstrate changes in behaviour, emotional wellbeing, or presentation.
- Indirectly communicate concerns through their behaviour, work, or interactions with others.

Staff must always act in the best interests of the child and follow the school's safeguarding procedures.

2. Responding to Concerns and Disclosures

If a child discloses abuse, staff should:

Do

- Remain calm and listen carefully.
- Take the child seriously.
- Reassure the child that they have done the right thing by telling someone.
- Explain that information will need to be shared with appropriate people who can help keep them safe.
- Record the disclosure accurately using the child's own words where possible.
- Report the concern immediately to the DSL or deputy DSL.

Do Not

- Promise confidentiality.
- Ask leading questions.
- Investigate the concern yourself.
- Interrupt or pressure the child.
- Confront an alleged perpetrator.

Immediate Risk

If a child is at immediate risk of significant harm, staff should contact Children's Social Care and/or the Police without delay and inform the DSL as soon as possible.

3. Categories of Abuse

Physical Abuse

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

Possible Indicators

- Unexplained injuries.
- Injuries inconsistent with explanations given.

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- Frequent injuries.
- Reluctance to change clothes.
- Fear of physical contact.
- Aggressive behaviour or extreme withdrawal.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and persistent adverse effects on their emotional development.

Possible Indicators

- Excessive withdrawal.
- Low self-esteem.
- Self-harm.
- Anxiety or depression.
- Delayed emotional development.
- Extreme compliance or attention-seeking behaviour.
- Difficulty forming relationships.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities. This can occur online or offline and may not always involve physical contact.

Possible Indicators

- Inappropriate sexualised behaviour.
- Knowledge beyond expected developmental levels.
- Sudden behavioural changes.
- Reluctance to be with certain individuals.
- Self-harm.
- Unexplained gifts or money.
- Sexually transmitted infections or pregnancy.

[Home | CSA Centre](#)

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs.

Possible Indicators

- Poor hygiene.
- Inadequate clothing.
- Frequent hunger.
- Untreated medical needs.
- Poor attendance.
- Tiredness or lethargy.

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- Developmental delay.

[Neglect-Screening-Tool.pdf](#)

Staff should not attempt to diagnose abuse or investigate concerns. Their role is to observe, record and report. Any concern, no matter how small it may appear, should be shared promptly with the Designated Safeguarding Lead to ensure children receive the help and protection they need.