Child Protection and Safeguarding Policy 2026/2027

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Important contact information

Role/Organisation	Name/Role if applicable	Telephone no.	Email
Headteacher	**Mrs Gingell**	0121 556 3387	
Designated safeguarding lead (DSL)	**Sarah Hill**	0121 556 3387	Sarah.hill@woak.co.uk
DDSL	**Mrs Kular** Deputy Headteacher **Mrs Tranter** Inclusion Manager **Miss Daly** School Business Manager **Miss Wooldridge** Lunchtime Supervisor / Parent Support & Mentor	0121 556 3387	office@woak.co.uk
Level 3 Safeguarding Trained	**Mrs Gingell** Headteacher **Miss Steadman** Assistant Headteacher **Mrs Ward** Assistant Headteacher **Mrs O'Neill** Assistant Headteacher & EYFS Lead	0121 556 3387	office@woak.co.uk
Chair of governors	**Sarah Beckett**	0121 556 3387	
The Link governor for safeguarding	**Sarah Beckett**	0121 556 3387	
The Designated teacher for children who are looked after/Previously looked after children lead	**Sarah Hill**	0121 556 3387	Sarah.hill@woak.co.uk
The Designated Lead for online Safety	**Sarah Hill**	0121 556 3387	Sarah.hill@woak.co.uk
Mental Health Lead	**Sarah Hill**	0121 556 3387	Sarah.hill@woak.co.uk
The Single Point of Contact (SPOC) under the PREVENT agenda	**Sarah Hill**	0121 556 3387	Sarah.hill@woak.co.uk
Channel helpline			020 7340 7264
Multi Agency Safeguarding Hub (MASH) and social care out of hours	**Social Care**	0121 569 3100	
Children's Disability Team	**Social Care**	0121 569 5616	**Website:** https://www.sandwellchildrenstrust.org/
Adult's Disability Team	**Social Care**	0121 569 2266	sandwell_enquiry@sandwell.gov.uk
Local Authority Child Protection Officers for Education	**Lisa Harvey** **Beverley Need** **Louise Atkinson** **Jemma Jones**	0121 569 3100	
Wednesbury Strengthening Families Team		0121 569 7294	
Horizons Exploitation Safeguarding Team		0121 569 2524/8391	CE team@sandwellchildrenstrust.org
Designated Officer LADO	**Charlotte Mullings / Elisabeth Johnson**		**Sandwell_lado@sandwellchildrenstrust.org**
Local Authority PREVENT Education Officer	**Justin Nixon**	07790396643	Access team@sandwellchildrenstrust.org Justin_nixon@sandwell,.gov.uk
National Counter Terrorism Helpline		0800 789 321	counter.extremism@education.gov
Female Genital Mutilation (FGM)	**Police**	101 or 999	
West Midlands Police	**Police**	101 Option 3 for WMP or 999	
Operation Encompass Key Adult		101	
NSPCC Whistleblowing helpline	**NSPCC**	0800 028 0285	Link available from KCSIE– NSPCC's 'What you can do to report abuse' available at: help@nspcc.org.uk

Availability

- The designated safeguarding lead or deputies will be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst our designated safeguarding lead (or deputy) will be available in person, there may be occasions, in exceptional circumstance when this is not possible however they may be available via e-mail, phone and/or Teams or other such mediums.
- Our school will arrange adequate and appropriate arrangements for any out of hours/out of term activities.
- The LA will be updated with contact details for emergencies.

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1.Safeguarding culture

'Safeguarding and promoting the welfare of children is **everyone's** responsibility. 'Children' includes everyone under the age of 18. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests of the child**' (**Keeping Children Safe in Education (2026)**.

Our Safeguarding and Child protection Policy ensures that everyone at Wednesbury Oak Academy adopts a **zero-tolerance approach** to abuse. The school aims to ensure that:

- **Appropriate action is taken in a timely manner to safeguard and promote children's welfare**
- **All staff are aware of their statutory responsibilities with respect to safeguarding both online and offline**
- **Staff are properly trained in recognising and reporting safeguarding issues including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.**

Safeguarding is everyone's responsibility and it is the duty of Wednesbury Oak Academy to safeguard and promote the welfare of children. This is our core safeguarding principle. To uphold this, we are committed to providing a safe and welcoming environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. Every child has an equal right to support and protection.

A key part of our safeguarding culture is this policy and the procedures it outlines. This policy applies to all staff, supply staff, volunteers, contractors, visitors, governing body, all of whom are trained on its contents and their safeguarding responsibilities. We update this policy at least once a year to stay current with changes in law, guidance, and best practices. It should be read in conjunction with our other safeguarding policies and documents, listed in section 4.

What this means for our pupils:

We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.

All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in a child protection or safeguarding issue will receive appropriate support. Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse. **All** of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

2. Safeguarding definition

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

KCSIE 2026 also considers some specific risks relating to AI-generated content, including deepfake images and videos, and highlights the role technology can play in facilitating abuse, exploitation and harmful behaviour.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis. There is expanded guidance emphasises in KCSIE 2026 that it is a safeguarding concern for both the victim and alleged perpetrator, and can include serious physical harm, threats and weapons.

3.Legislation and guidance

This policy is based on the Department for Education's statutory guidance **Keeping Children Safe in Education (2026)** and **Working Together to Safeguard Children (2023)** and the **Governance Handbook**. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

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

Other statutory provisions and guidance relevant to child protection and safeguarding include:

- Sandwell Children's Safeguarding Partnership - Inter Agency Procedures – Welcome | West Midlands Safeguarding Children Group (procedures.org.uk)
- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education (September 2026)
- Information sharing advice for safeguarding practitioners providing safeguarding services to children, young people, parents and carers
- What to do if you are worried a child is being abused (March 2015)
- Sections 26 & 29 of the Counter Terrorism and Security Act 2015
- Section 5B of the Female Genital Mutilation Act 2003
- Children Act 1989 & 2004
- Disqualification under the Children Act 2006 (August 2018 Regulations)
- Relationships, Education, Relationships and Sex Education (RSE) and Health Education.

4. Related policies

Our policy relates to safeguarding and child protection concerns and sits within a suite of other safeguarding policies. Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

Our policy applies to all staff teaching and non-teaching, governors and volunteers, supply staff and contractors working in our school. It will be reviewed at least annually by the governing body and is in line with our local safeguarding procedures and the expectations of the Department of Education and Ofsted which inspects schools' safeguarding arrangements.

This document must therefore be read, used, and applied alongside Wednesbury Oak Academy policies and procedures referred to below:

- Safer Recruitment Policy
- Code of Conduct
- The Single Central Record of identity, qualification, and vetting checks for all staff and volunteers
- Staff Induction Policy and Procedures
- Individual school policies on monitoring and supervision
- Policy on dealing with allegations against members of staff
- Whistleblowing policy
- Safety Intervention Restraint Policy.
- Working together to improve school attendance

Please note all these policies and procedures are available on Wednesbury Oak Academy website and available from Wednesbury Oak Academy office on request.

5. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 11)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are a child we care for or a previous child we care for (see section 14)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

It is the responsibility of **all** staff to consider the potential of abuse first and not simply see their behaviour as part of their SEN or disability. There are additional indicators staff need to be aware of; malnourishment, lack of stimulation, rough handling, ill-fitting equipment, misappropriation of a child's finances and deprivation of medication.

6. Roles and responsibilities

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

6.1 All staff

The Teacher Standards (2012) state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We extend this level of duty to include all the staff, supply staff, volunteers and contractors who work at Wednesbury Oak Academy.

- All class-based staff and those who work directly with children are expected to read and understand Part One of Keeping children safe in education 2026.
- Sign a declaration at the beginning of each academic year to say that they have read and understood the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy for learning and relationships policy, online safety policy and the children missing in education policy.
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation

(CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection - Appendix 7 of this policy outlines in more detail how staff are supposed to do this.

Supply staff, volunteers, contractors, work experience and students' responsibilities

The DSL and DDSLs will explain the responsibility of reporting any concerns about children's safety and welfare to the DSL. Further, they will be briefed on the school's confidentiality policy and the code of conduct that we expect from all in our school. Therefore, supply staff, volunteers, contractors and students have the responsibility to:

- Work within the school's code of conduct, KCSIE, safeguarding/child protection policy and confidentiality/information sharing expectations; and
- Immediately share any concerns about a child's welfare with the DSL or Deputy DSL in the DLS's absence.

6.2 Governing Body/Proprietors/Management Committee

Our Safeguarding Link Governor is: Sarah Beckett **Our Chair of Governors is:** Sarah Beckett

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead (or, link governor) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 5 of this policy covers this procedure
- That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate. All governors will read Keeping Children Safe in Education in its entirety.

Multi-agency working

Wednesbury Oak Academy contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

- SLT and the DSL/DDSLs understand their role in the new safeguarding partner arrangements
- We co-operate and engage fully with the new published safeguarding arrangements
- Wednesbury Oak Academy will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Wednesbury Oak Academy will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- That our safeguarding arrangements consider the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the three safeguarding partners. This will include understanding and reflecting local protocols for assessment and the threshold document along with supplying information as requested by the three safeguarding partners.

Information sharing

Our governing body understand that sharing information is vital in identifying and tackling all forms of abuse and neglect and in promoting children's welfare, including their educational outcomes. They understand that we have clear powers to share, hold and use information for these purposes.

- Our governors understand and recognise the importance of information sharing between practitioners and local agencies. Our governors will ensure arrangements are in place that set out clearly the process and principles of information sharing within the academy and with the three safeguarding partners, other organisations, agencies and practitioners as required
- Our governors understand the Data Protection Act 2018 and the GDPR places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- Our Governors understand the DPA 2018 and the GDPR are not barriers to sharing information where the failure to do so would result in a child being placed at risk of harm, they understand that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Our governors will ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- Our governors will ensure that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- If our academy is unable to provide pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we should withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt our school will seek independent legal advice.
- Where children leave our academy, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt will be obtained from the receiving school or college. The file will be transferred separately from the main pupil file. Our school will ensure key staff such as designated safeguarding leads and SENCOs are aware as required.

- In addition to the child protection file, our designated safeguarding lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the Channel programme and have that support in place for when the child arrives.

Expanded guidance from KCSIE 2026 clarifies that:

- When deciding what information to share, schools should consider the relevancy of the information, what the receiving setting needs to know and whether the information is clearly presented and suitably contextualised • staff should use professional judgement to make sure that any information shared is focused and proportionate • where a pupil is changing settings and information indicates a risk to others and/or the individual pupil, the receiving school is responsible for assessing risk and putting a safety and support plan in place; the DSLs from both settings should have a conversation where there are concerns.

Staff training

All staff members undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction.

- The training will be regularly updated.
- Induction and training will be in line with advice from the three safeguarding partners. In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- The governing body recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns daily. Our staff will be provided with the opportunity to contribute to and shape safeguarding arrangements and child protection policy.
- Safeguarding training, including online safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff staining and curriculum planning
- Whilst consider training requirements there will be regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of pupils.

Online Safety

Our governing body understand that our school increasingly works online and that it is essential that children are safeguarded from potentially harmful and inappropriate online material. As school our monitoring software is Senso. This helps to monitor all activity that children use when using any online device in school.

- Appropriate filters and appropriate monitoring systems are in place and take care that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Remote learning - Where children are being asked to learn online at home our school will refer to and use the links and resources provided by the DfE: safeguarding in schools, colleges and other providers, and safeguarding and remote education.
- Technology and the risks and harms associated with it evolve rapidly. We will review our approach to online safety annually, supported by an annual risk assessment.

Opportunities to teach safeguarding

- Governing bodies will ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs, disabilities or health issues.
- We will teach about online challenges and hoaxes and share this information about this with parents and carers.
- Relevant topics will be included within Relationships Education and Health Education. In teaching these subjects we will have regard to the statutory guidance.
- Preventative education is most effective in the context of a whole-school approach that prepares our pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, transphobic and sexual violence/harassment. We will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program will tackle at an age-appropriate stages issues such as:
    - healthy and respectful relationships

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

Inspection

- They are familiar with the Ofsted Education Inspection Framework and safeguarding: Inspecting safeguarding in early years, education and skills settings.

Safer recruitment

- They prevent people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check staff, supply staff and volunteers who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Our academy has written recruitment and selection policies and procedures in place; and
- At least one person on any appointment panel has undertaken appropriate safer recruitment training which is kept up to date.
- We will ensure that the policies and procedures are monitored to ensure they are effective and embedded.

Dealing with concerns about staff who may pose a risk of harm to children

- There are procedures in place to manage concerns/allegations against teachers and support staff (including supply staff and volunteers), that might indicate they would pose a risk of harm to children. These allegations or concerns will be referred to the designated officer at the local authority, Ms Michelle Pinnock-Ouma, by the appropriate person. Our school will follow the procedures outlined in part 4 of Keeping Children Safe in Education.
- "Lower level" concerns will be addressed as set out in Section 2 of Part for of KCSIE.
- Procedures are in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Our governing body is aware that this is a legal duty and failure to refer when the criteria are met is a criminal offence.

Child-on-child abuse

- ALL staff should recognise that children can abuse their peers. Our governing body will ensure that ALL staff are clear about our school's policy and procedures regarding child-on-child abuse.

Our safeguarding/child protection policy includes:

- Procedures to minimise the risk of child-on-child abuse.
- Systems in place (and they are well promoted, easily understandable and easily accessible) for children to confidently report abuse, knowing that their concern will be treated seriously.
- Sets out how allegations of child-on-child abuse will be recorded, investigated and dealt with.
- Recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not reported.
- Clear processes as to how victims, perpetrators and any other child affected by of child-on-child abuse will be supported.
- A statement that makes clear there should be a zero-tolerance approach to abuse and it will never be tolerated or passed off as "banter" "just having a laugh" or "part of growing up".
- Recognition of the gendered nature of child-on-child abuse, that all child-on-child abuse is unacceptable and will be taken seriously.
- The different forms of child-on-child abuse, such as: bullying - including cyberbullying, prejudice based and discriminatory bullying; sexual violence and harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; up-skirting; consensual and non-consensual sharing of nudes and semi-nude images and/or videos; causing someone to engage in sexual activity without consent; abuse in intimate relationships between peers and initiation/hazing type violence and rituals.

The Child's wishes

- The child's wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Systems and processes will operate with the best interests of the child at their heart.

Children potentially at greater risk of harm

For children who need a social worker (Child in Need and Child Protection Plans):

- The school DSL/or deputies are aware that some children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact a child has a social worker. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

For children requiring mental health support:

- School has an important role to play in supporting the mental health and wellbeing of their pupils. 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. Our governing body ensures our school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems

New guidance in KCSIE 2026 states:
The role of education staff is not to diagnose mental health problems, but that staff can help to fulfil four key roles:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing or at risk of developing mental health problems
- making sure early targeted support is provided

For children and young people we care for and previous children and young people we care for

- Staff have the skills, knowledge and understanding necessary to keep children we care for safe
- That appropriate staff have the information they need in relation to a child we care for legal status (whether they are cared for under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Child We Care for Lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- All staff have the skills, knowledge and understanding to keep previous children we care for safe. When dealing with children we care for and previous children we care for, we will ensure that all agencies work together, and prompt action will be taken when necessary to safeguard these children.

Designated Teacher

- The school appoint a designated teacher to work with local authorities to promote the educational achievement of registered children who are cared for and to ensure that this person has appropriate training. With the commencement of the sections 4-6 of the Children and Social Work Act 2017, the designated teacher will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales
- The designated teacher has appropriate training and relevant qualifications and experience.

Care leavers

- Our governing body knows that the local authority has ongoing responsibilities to young people who cease to be looked after and become care leavers.
- Designated safeguarding leads will obtain details of the local authority Personal Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

Children with special educational needs, disabilities (SEND) or health issues

- Our governors know that children with special educational needs and disabilities or certain medical or physical health conditions may face additional safeguarding challenges
- Our Child Protection and Safeguarding policy reflects the fact that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities or certain medical or physical health conditions.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

- Children with SEN and disabilities or certain medical or physical conditions can be disproportionally impacted by things like bullying- without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

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

Elective home education
Many home educated children have an overwhelmingly positive leaning experience. Wednesbury Oak Academy expects the parents' decision to home educate to be made with their child's best education at the heart of the decision. Where a parent/carer has expressed their intention to remove a child from Wednesbury Oak Academy with the view to educating at home a meeting between the LA, school and other key professionals and parents/carers will take place. This meeting is particularly important where a child has SEND, is vulnerable and/or has a social worker.

The use of 'reasonable force' in schools and colleges
Our governing body know and understand there are circumstances when it is appropriate for our staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as guiding a pupil by the arm out of the classroom.

Our school does not adopt a 'no contact' policy, we have a policy which allows and supports our staff to make appropriate physical contact that enables staff to fully support and protect our students. The decision on whether to use reasonable force to control or apply a safety intervention hold to a student is down to the professional judgement of the staff concerned and will always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, our academy will consider the risks carefully and recognise the additional vulnerability of these groups. We will also consider out duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, our academy can reduce the occurrence of challenging behaviour and the need to use reasonable force. Applying a safety intervention hold will always be used as a last resort, when all measures to de-escalate have been exhausted.

You can find further details of this in our Safety Intervention Restraint Policy.

Use of school premises for non-school activities when rented out
- Governors will ensure that the appropriate arrangements are in place to keep children safe when organisations hire school facilities.
- The Governing Body will seek assurance that the hirer has the appropriate safeguarding and child protection policies in place (including inspection these if needed) and ensure that there are arrangements in place to liaise with the school on these matters if needed.
- Safeguarding arrangements will be included in any transfer of hire agreements, as a condition of use and occupation.
- Agreements will be terminated if there is failure to comply.

6.3 The Headteacher

The Headteacher is responsible for the implementation of this policy, including, ensuring that staff (including supply staff, volunteers and contractors) follow and understand:
- Are informed of our systems which support safeguarding, including this policy, as part of their induction/introduction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent. New guidance from KCSIE 2026 states that robust cover should be implemented in the event that the DSL is not present. At Wednesbury Oak Academy, this would be a named DDSL.
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and SLT on this.
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

Virtual school heads
Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g., DSLs, SENCOs, social workers, mental health leads and others.

6.4 Designated and Deputy Safeguarding Leads (ANNEX C)

The Designated Safeguarding Lead (DSL) is: Sarah Hill

The Deputy Designated Safeguarding Leads (DDSLs) are: Mrs Kular, Mrs Tranter, Miss Daly, Miss Wooldridge

Our governing body will ensure that a senior member of staff from the leadership team is appointed to the role of designated safeguarding lead. The designated safeguarding lead (DSL) will take lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep children safe online. Their responsibilities will be explicit in the role holder's job description.

Our governing body will ensure that this person has the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and /or support other staff to do
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- As Prevent lead: Make sure that staff have appropriate Prevent training and induction

Our governing body will determine whether to appoint additional deputy designated safeguarding leads, they will be trained to the same level as the designated safeguarding lead and their responsibilities will be explicit in their job description.

Our designated safeguarding lead may delegate safeguarding activities to the deputy safeguarding lead however the designated safeguarding lead will retain the lead responsibility for child protection and safeguarding. This responsibility will not be delegated.

At Wednesbury Oak Academy the DSL in line with Keeping Children Safe in Education is expected to:

Manage referrals

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

Working with others

- Liaise with the headteacher to inform her of issues especially on-going enquiries under section 47 of the Children Act 1989 and police investigations. This will include being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019)
- Act as a point of contact with the three safeguarding partners.
- As required, liaise with the "case manager" (as per Part four KCSIE) and the designated officer at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs or the named person with the oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Act as a source of support, advice and expertise for staff.

- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

    1. ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
    2. support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Training, knowledge and skills:

- The DSL and DDSLs will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.
- The DSL will undertake Prevent awareness training.

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as the specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- liaise with local authority case managers and designated officers for child protection concerns as appropriate;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children;
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies;
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- take the lead responsibility for safeguarding and online safety, which includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checking the schools filtering and monitoring systems are appropriate;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation;
- can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

In addition to the formal training set out above, the knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Raise awareness

- Ensure the academy's child protection policies are known, understood and used appropriately especially new and part time staff;
- Ensure the academy's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- Ensure the child protection policy is available publicly and parents know referrals about suspected abuse, neglect or exploitation may be made and the role of the academies in this;
- Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Information sharing and the child protection file

- The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.
- Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.
- Records should include - A clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome
- They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and **within 5 days for an in-year transfer or within the first 5 days of the start of a new term.** This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes;
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support; and
- ensure all staff understand the expectations, applicable roles and responsibilities in relation to the schools filtering and monitoring systems.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping Safeguarding Report for Governors. The DSL will complete a Safeguarding Report for Governors at least every term.

6.5 Parental Responsibilities

At Wednesbury Oak Academy we have an open-door policy where we encourage parents to share any concerns regarding their own children or any other child/children who they feel may be at risk of harm. All concerns will be explored in a sensitive and timely manner. Parents /carers should ensure their child attends school and that they arrive on time and are collected on time. We expect parents/carers to notify us of any changes in family circumstances and inform us of any changes of address and contact numbers and where reasonably possible to provide more than one emergency contact number.

6.6 Pupil's Responsibilities

At Wednesbury Oak Academy, we respect our pupils. The atmosphere within Wednesbury Oak Academy is one that encourages all pupils to do their best and to talk freely about any concerns or worries. We provide opportunities that enable our children to take and make decisions for themselves. Pupils will always be taken seriously and listened to if they seek help from a member of staff. Our school encourages all pupils to share any worries or concerns with any adult in the school at any time.

7.Confidentiality and Information sharing

We recognise that all matters relating to child protection are confidential. The Head teacher, DSL or DDSLs will disclose any information about a pupil to other members of staff on a need-to-know basis only. We also understand that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy). Confidentiality is also addressed in this policy with respect to record-keeping, in Allegations of abuse against staff (including low-level concerns) in appendix 6.

Communication with parents
Wednesbury Oak Academy will always discuss concerns with parents/carers and consent for any referrals should be sought unless to do so would:

- Place the child at risk of significant harm or further risk of significant harm;
- Place a vulnerable adult at risk of harm; and
- Compromise any enquiries that need to be undertaken by children's social care or the police.

The school will endeavour to ensure that parents understand the responsibilities placed on the school and staff for safeguarding children. In the best interests of safeguarding children there may be occasions when the school must consult with other agencies without a parent or carer's prior knowledge. Our first concern and responsibility is the child's welfare and we have a duty to protect children first and always. Such consultation may result in a formal referral which could prompt visits from social care and/or the police. We fully understand that this can be a very distressing set of circumstances. Our school will follow the procedures required by the multi-agency partnership arrangements.

The visit may take place at the school at the request of the police or social care. In the event of the meeting being held at school parents/carers will be asked by the school to remain on the school premises until such time that the police or social care can attend. If parents/carers choose to leave school premises with their child, the school will contact the police or social care to inform them of the parent's/carer's decision. Our school will employ the services of an interpreter if required.

8. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence) or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as FGM or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

If a child is suffering or likely to suffer harm, or in immediate danger. Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral** – (refer to Appendix 1). Tell the DSL as soon as possible if you make a referral directly. The following link to the GOV.UK website will support you reporting abuse to your local council: **https://www.gov.uk/report-child-abuse-to-local-council**

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and enter electronically onto CPOMS and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Recording a reporting concerns and disclosures procedures

All safeguarding concerns must be documented in writing using CPOMS by the staff member who identifies the issue. Any verbal reports must be promptly followed by a written report on CPOMS and submitted within one hour, but no later than the end of the school day.

When physical injuries on a child are part of the evidence, staff must document the details of these injuries on a body map. All paper records will be securely stored in a separate, confidential file within a locked cabinet, with restricted access, or at the highest access level on CPOMS. If staff are uncertain about the recording requirements, they should seek guidance from the Designated Safeguarding Lead.

Each safeguarding concern record should include:

- Details of the child's name, DOB, class etc.
- Address, contact numbers;
- Parent/carers names;
- Siblings (different names?);
- All details of the concerns/behaviour/incident/disclosure;
- Use child's own words;
- Ensure all information recorded is factual and accurate;
- Date and time of recording;
- Who the incident/disclosure was made to;
- Note any other witnesses;
- Use full names and titles/roles;
- Do not use abbreviations;
- To whom the concern was reported to and time DSL notified;
- Chronology of actions – date, place, who and what; and
- Name and date of person recording the incident.
- Written in third person

Making a referral to children's social care – points to be considered

Child protection procedures

Upon receipt of a school concern form the DSL will decide and seek advice to determine whether the concern/disclosure meets a threshold for support.

The DSL or DDSL will consider: Is this a child with unmet needs where health, development or achievement may be affected? Practitioners should form a Team around the Family (TAF) and complete an Early Help Assessment (EHA) when:

- Age-appropriate progress is not being made and the causes are unclear; or
- The support of more than one agency is needed to meet the child or young person's needs.

If this is a child with additional needs the DSL or deputy will discuss the issues with the child's parents/carers. The DSL or Deputy DSL will obtain parental consent for an Early Help Assessment to be completed.

Is this a child in need? Section 17 of the Children Act 1989 says:

- The child is unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development.
- The child's health or development is likely to be impaired, or further impaired without the provision of such services; and
- The child has a disability.

Is this a Child Protection matter? Section 47 of the Children Act 1989 says:

- Children at risk or who are suffering significant harm.
- Children suffering the effects of significant harm.
- Serious health problems.

All concerns, child with unmet needs, Child in Need and Child Protection matters, **must** be discussed with the DSL or deputy and will need to be assessed and referred using the correct channels by the school as soon as possible. It is important to recognise anybody can make a referral where they believe a child to be in imminent danger or at risk of harm

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

It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

Significant harm may also arise from a combination of significant events which are both acute and long standing and which impair the child's physical, psychological and social development. To both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g., medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment of failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

Making a referral

If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and /or the police immediately.

Anybody can make a referral. Although, where a child is registered at school, consultation should take place with the school's DSL or DDSL, who will often be the most appropriate person to initiate any referral. A written record of the concerns should be made using the schools internal recording form (CPOMS). This should be used to aid in the decision-making process if a referral is needed to the MASH team.

For referral to MASH phone 01215693100 and speak to a social worker. Any action will need to be followed up with a written confirmation on the MARF (Multi Agency Referral form).

Voice of the child – (children's wishes)

Children's wishes and feelings are considered if appropriate when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Staff members do not promise confidentiality and always act in the best interests of the child.

If you discover that FGM has taken place, or a pupil is at risk of FGM

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a **mandatory statutory duty**, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care 0121 569 3100. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. Early Help support can be accessed through the **Sandwell safeguarding team on 0121 569 3100.**

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. The SSCP Escalation/Resolution of Professional Disagreements Policy will be used to challenge, resolve and if necessary, escalate any concerns the school may have when working with other agencies in safeguarding children.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern that is **not** also a safeguarding concern, speak to the Mental health lead to agree a course of action.

Updates to KCSIE 2026 include:

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should 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 for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a concern about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

If the concerns/allegations are about the Headteacher, speak to the Chair of Governors in the first instance. If you are not happy with the outcome, you can contact local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children (this applies regardless of whether or not the children who attend any of these sessions or activities are children on the school roll or attend the school/college), follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 7 for more information about child-on-child abuse. The school recognises that child-on-child abuse is a problem and is happening, even when the issues are not reported. This sort of abuse has a serious impact on those who are victims, in terms of self-esteem and relationships but also educational outcomes.

Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services, if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure pupils can easily and confidently report abuse using our reporting systems
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and /or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they must play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including the potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will coordinate in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action to the victim as well as the alleged perpetrator.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Acting would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Sharing of nudes and semi-nudes

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video **you must report it to the DSL immediately.**

You must **not**:

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

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 7 for more information on assessing adult-involved incidents.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the local neighbourhood police by dialling 101 or starting an online chat with the police; this is usually a quicker way to report.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationship's education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

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

- Putting safeguarding first

- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Reporting systems for our pupils

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Make it clear to pupils in terms of who they should report concerns to and reassurances following disclosures
- Make pupils aware of our reporting systems and procedures through discussion in our relationships education curriculum
- Reassure and offer comfort to the child, recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.

9. Online safety and the use of mobile technology

Online safety curriculum and computing, use of mobile technology.

The Designated Lead for Online Safety is: Sarah Hill

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

To address this, our school aims to:

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

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The best protection is to make pupils aware of the dangers through curriculum teaching particularly computing and on-line safety, PSHE and RSHE.

At Wednesbury Oak Academy to meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. Covering:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online

    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

Wednesbury Oak now have a Mobile Phone Policy in place which is adhered to by all staff.

Artificial intelligence (AI)

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

Wednesbury Oak Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g., bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Wednesbury Oak Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour for Learning and Relationships Policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.
While KCSIE 2026 does not provide formal guidance on artificial technology (AI), it acknowledges the need for future updates to address the risks associated with such emerging technologies, including AI and encrypted communications.

Keeping Children Safe in Education 2026 (KCSIE 2026) has expanded its definition of online harms, explicitly including misinformation, disinformation (including fake news), and conspiracy theories as online safeguarding harms. This reflects growing concerns about the impact of digital content on student well-being and the need for schools to educate students on recognising and questioning digital information.

New legislation has come into force from 25th July 2025. The Online Safety Act 2023 introduces stronger protections for children online, including a legal requirement for all pornography sites accessed in the UK to have effective age verification in place by 25th

July 2026. Major sites have agreed to comply using tools such as facial age estimation and ID checks. Ofcom will enforce this duty and can fine or block services that fail to meet the standard.

The Act also requires platforms to carry out risk assessments, apply age-appropriate controls, and remove illegal content such as child sexual abuse material, grooming, and incitement to violence. Platforms must now consider how their design, including algorithms, anonymity, and livestreaming, may expose users to harm. Schools should ensure staff are aware of these changes and review how online safety is addressed through curriculum and safeguarding procedures.

In addition to age verification, the Act introduces new criminal offences. These include cyberflashing, epilepsy trolling, and encouraging or assisting serious self-harm, which are now illegal even if done anonymously. It is also a crime to share deepfake pornography or send false information with intent to harm. Laws on non-consensual intimate images have been strengthened to cover threats to share, and images altered using AI. DSLs should help ensure these risks are understood by staff as safeguarding issues and addressed in training and policy.

KCSIE 2026 has added a link to the **plan technology for your school** service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

11. Children with special educational needs, disabilities or health issues

At Wednesbury Oak Academy we are aware that children with special educational needs and disabilities or certain health issues may face additional safeguarding challenges both online and offline. They are also three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- Children with SEN and disabilities and certain health issues can be disproportionally impacted by things like bullying- without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

We will ensure we have appropriate mechanisms in place to assist these children. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENDCO. We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Examples of mechanisms:

- Suitably qualified professionals SENCO
- Referrals to specialist agencies
- Use of communication packages
- Use of signs and symbols
- One to one support for communication
- Appropriate IT aides

12. Children who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. Our school follows statutory guidance on Relationships, Education, Relationships and Sex Education (RSE) and Health Education.
https://assets.publishing.service.gov.uk/media/689c57087b2e384441636190/RSHE_Statutory_Guidance_-_July_2026.pdf

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL (also see Equality Policy and Objectives – pupils).

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children. When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

KCSIE 2026 has brought in new legislation that states schools must not allow children into toilets designated for the opposite biological sex. If a gender questioning child does not want to use the toilet designated for their biological sex, schools should consider whether they can provide an alternative toilet facility, without compromising single-sex toilet provision. Schools should keep a clear record of these situations, communicate them appropriately and review them regularly.

KCSIE 2026 has also stated regarding changing rooms and showers that schools must not allow a child aged 11 years or older at the start of the school year to undress in front of a child of the opposite biological sex. If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, schools should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. This could be achieved by using a separate fully enclosed room or by using existing facilities at separate times. Schools should keep a clear record of these situations, communicate them appropriately and review them regularly.

13. Pupils with a social worker

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

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

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

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

14. Children we care for and previous children we care for

Our designated teacher for children we care for and previous children we care for is Sarah Hill.

We will ensure that staff have the skills, knowledge and understanding to keep children we care for and previous children we care for, safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children we care for legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated teacher will:

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

Care leavers

Local authorities have on-going responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. Our designated safeguarding lead or deputy should be given details of the local authority personal advisor appointed to guide and support the care leaver, our designated safeguarding lead or deputy will liaise with the personal advisor as necessary regarding any issues of concern affecting the care leaver.

15. Complaints and concerns about school safeguarding policies

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Other complaints

If parents want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent views of safety in school via parent voice surveys.

Whistleblowing (Please refer to our whistleblowing policy for further information)

All staff, volunteers and parents at Wednesbury Oak Academy should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and such concerns will be taken seriously by our Headteacher.

Our school has adopted the local authority Whistleblowing Policy and appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with our Headteacher, governing body or senior leadership team.

Where a staff member feels unable to raise an issue with our headteacher, governing body or senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, for example: **The** NSPCC whistleblowing helpline – What you can do to report abuse is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

16. Record keeping

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

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:

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

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Record keeping and information security

All records will be stored in a separate confidential file in a locked cabinet in a secure place with restricted access, or on the highest access level of CPOMS.

Sharing information with other organisations

Staff should be familiar with and use Information sharing advice for safeguarding practitioners.
As part of our work in partnership with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so. This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore; staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to so do.

Decisions to share safeguarding information with other organisations will be overseen by the Designated Safeguarding Lead (please also refer to Designated Safeguarding Lead Response).

In addition:

- Appendix 5 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 6 sets out our policy on record-keeping with respect to allegations of abuse made against staff

17. Safeguarding training

All staff

All staff members will undertake safeguarding and child protection training, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of expectations, applicable roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers: **Manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils**

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers will also receive appropriate training.

Induction

All staff members including governors will undergo safeguarding and child protection training at induction. The training will be regularly updated. Induction and training provided will be in line with advice from the WST. Upon appointment and starting the new post, new staff, students and volunteers will be issued with an induction pack, which includes: Safeguarding policy, Keeping Children Safe in Education -Part 1, and Annex c, Whistleblowing Policy, Management of Allegations Policy, Code of Conduct, Acceptable use of IT policy, Behaviour policy, our academy's children missing in education procedures and other relevant safeguarding training information e.g. the names of the DSL and DDSL(s). They will sign to say that they have received it, read and understood it. A meeting will be arranged on appointment to clarify and check understanding and to respond to any questions.

The DSL and DDSLs

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Governors

All governors receive training about safeguarding and child protection including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction, which is regularly updated. This is to make sure that they:

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

As the chair of governors may be required to act as the 'case manager' if an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

Recruitment – interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See appendix 5 of this policy for more information about our safer recruitment procedures.

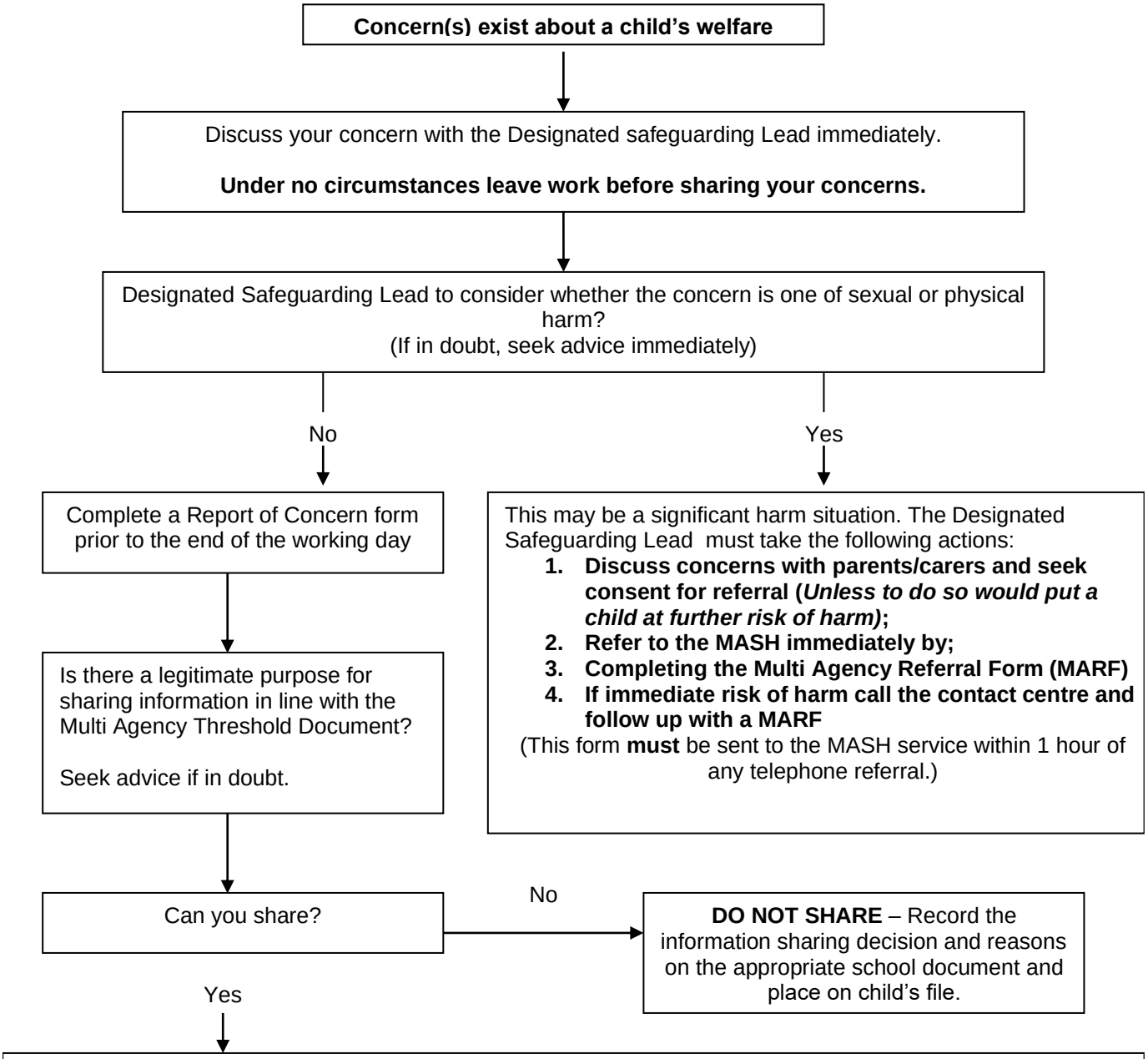
Staff who have contact with pupils and families

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

18. Monitoring arrangements

Our safeguarding policy and procedures will be reviewed annually or sooner if required. All staff and stakeholders may contribute to the development of our policies and procedures. Our policy will be published on our website and paper copies are available upon request. At every review, it will be approved by the full governing board.

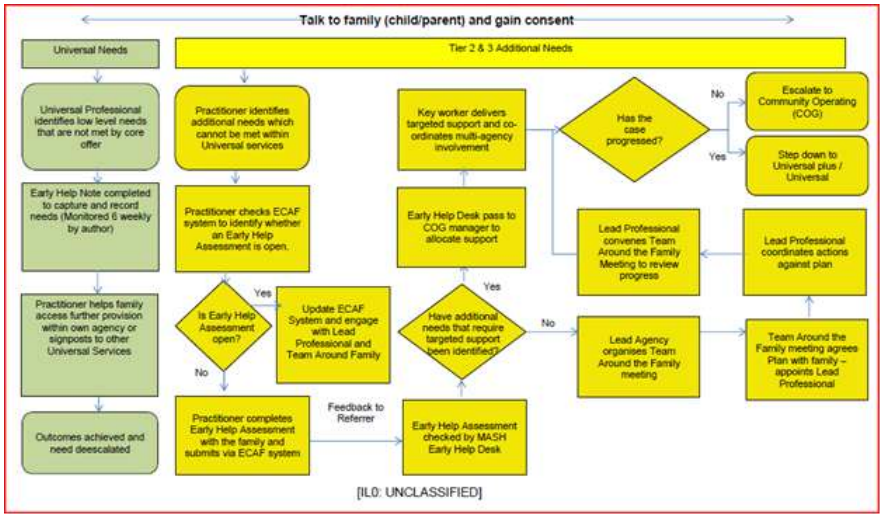
Appendix 1 - Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, this should not delay action)

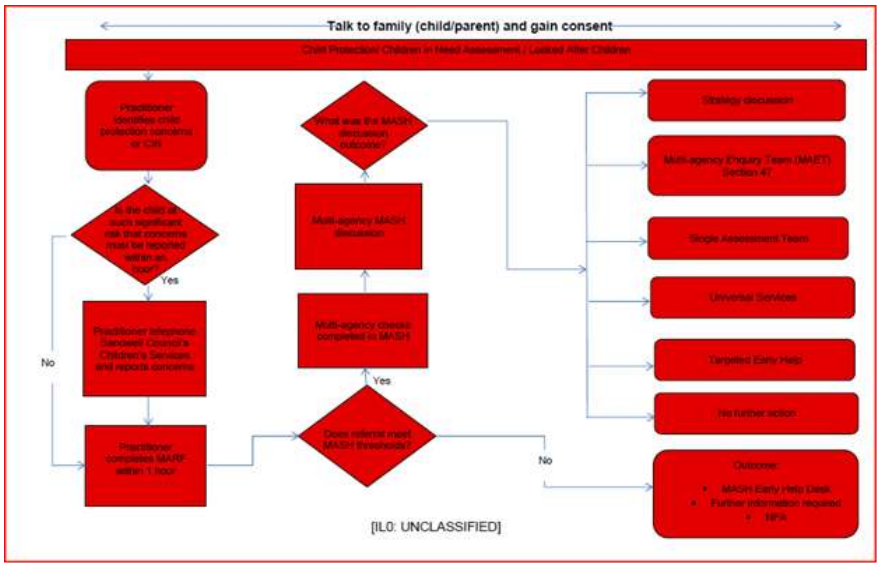


SHARING INFORMATION WHEN THERE ARE NO SIGNIFICANT HARM CONCERNS:

- Record the concern on a Report of Concern form, distinguishing fact from opinion. Using the Multi Agency Threshold Document consider if your concern meets the threshold (safeguarding concerns) for the offer of an early help assessment or the threshold for risk of significant harm (child protection).
- Early Help MASH – concerns that you believe are safeguarding concerns. Complete **Early Help Assessment** and submit via e-caf (if trained), via post to Early Help Team, PO Box 16021, Oldbury, B69 9EW or via e-mail to ecaf_queries@sandwell.gov.uk
- Child Protection MASH – concerns that you believe are child protection concerns. Contact your designated lead; consult with Early Help Social Worker for advice and guidance. Send completed **MARF** (multi-agency referral form) via secure e-mail to access_team@sandwellchildrenstrust.org or if an emergency that cannot wait an hour – call Sandwell's Contact Centre on 0121 569 3100
- **Record** the information sharing decision, your reasons, and open a confidential Safeguarding file for the child (if one does not already exist). Also note any agreed action, who is to complete this and by when.

Appendix 1 cont'd - Process map





Appendix 2 - Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school/ and/or can occur between children outside the school. All our staff, especially the DSL/DDSL should be considering the context within which such incidents and/or behaviours occur.

Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding. This can be evidenced in informal and formal assessments of need/risk for the child and can be included in case discussions in DSL/DDSL supervision sessions.

All staff at Wednesbury Oak Academy should possess an understanding of safeguarding concerns and be knowledgeable about the behaviours associated with child exploitation, county lines, mental health and domestic abuse as these pose risks to our students. Wednesbury Oak Academy's contextual safeguarding details will undergo periodic reviews, and the information disseminated to all staff on a termly basis.

Appendix 3 - What is child Abuse? (Based on statutory guidance KCSIE 2026)

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

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

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 4 - Safer working practices

Our school has a code of conduct; all staff, supply staff and volunteers are issued with this at induction. You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- Work in a room where there is a glass panel in the door or leave the door open;
- Make sure that other adults visit the room occasionally;
- Avoid working in isolation with children unless thought has been given to safeguards;
- Must not give out personal mobile phone numbers or private e-mail addresses;
- Must not give pupils lifts home in your cars;
- Must not arrange to meet them outside of school hours; and
- Must not chat to pupils on social websites.

Under the sexual Offences Act 2003 it is a criminal offence for anyone working in an educational setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of physical force or restraint of pupils carried out and documented in accordance with the relevant physical restraint/positive handling policy. If it is necessary to use physical action to prevent a child from injury to themselves or others, parents will be informed.

Appendix 5 - Safer recruitment

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2026.

(Also see Safer Recruitment policy).

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Sarah Hill, Rebecca Tranter, Kim Daly, Lisa Steadman and Sarah Ward have undertaken appropriate training in Safer Recruitment. One of the above will be involved in all staff / volunteer recruitment processes and sit on the recruitment panel.

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

- Check that candidate taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in **relevant conduct;** or
- We believe the **individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 ; or**
- We believe the 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm)
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

New guidance set out in KCSIE 2026 states for volunteers:

- Any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children for more than 3 days in a 30-day period or overnight is now in regulated activity. This requires schools to obtain enhanced DBS with barred list checks or work with other relevant settings where the person is volunteering to decide who applies for the check.
- Schools must also obtain enhanced DBS with barred list checks for existing volunteers who now fall under regulated activity.
- In cases where volunteers do not fall under regulated activity, schools should undertake a written risk assessment and use professional judgement to decide which checks, if any, are required. The guidance sets out what this risk assessment should consider.

Governors

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 6 – Allegations against staff (including low-levels concerns)

It is important that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member. Our school has adopted the LA Managing Allegations Policy.

Our policy complies with the guidance set out in part four of Keeping Children Safe in Education 2024.

All allegations of abuse of children carried out by any staff member or volunteer will be taken seriously. If an allegation is made regarding a member of staff, a supply teacher, volunteer or contractor, the following will be considered:

Has the member of staff/supply teacher/volunteer/contractor;

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If an allegation is made against a member of staff, supply staff, volunteer or contractor the headteacher must be informed immediately or as soon as possible within 1 working day and he or she must contact the Designated Officer (**Ms Michelle Pinnock-Ouma**) immediately to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

If our school must consider an allegation against an individual not directly employed by us, where our disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business. Whilst our school is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will our school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Our governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. Our school will comply with all aspects of the guidance in Part 4 of KCSIE.

If an allegation is made against the headteacher, the member of staff who has the concern must contact the chair of governors who must then contact the Designated Officer immediately or as soon as possible within 1 working day to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

Our procedures and approach to dealing with allegations will be applied with sensitivity and common sense. Our academy will exercise its duty of care to employees, we will act appropriately to manage and minimise the stress inherent in the allegation process. Our academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

At Wednesbury Oak Academy we understand that there is a legal requirement for employers to make a referral to the DBS where we think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up and a referral to the DBS must be made if the criteria are met (outlined in KCSIE).

As part of our whole school approach to safeguarding, we will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. We have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. The Designated Officer in Sandwell is **Ms Michelle Pinnock-Ouma.**

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. We also have a duty of care towards our staff, and we will provide a named contact for the staff member.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate. We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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 low-level concerns policy.

At Wednesbury Oak Academy we create a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral.

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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Low-level concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or because of vetting checks undertaken. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately.
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 pupils.

If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking:

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

Our governing body will set out their low-level concerns policy within their staff code of conduct and safeguarding policies. It will contain procedures for sharing confidentiality such concerns which is clear, easy to understand an implement.

Low-level concerns about a member of staff, supply staff, volunteer or contractor will be reported to the headteacher. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Sharing low-level concerns

We will create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Low level concerns should be reported in person to the Headteacher*;* to embed our culture of openness and transparency. To ensure that our school's values and expected behaviours are lived, monitored, and reinforced by all staff.

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's (staff code of conduct). The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

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

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

However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference. The Designated Officer in Sandwell is **Ms Michelle Pinnock-Ouma.**

Appendix 7 - Specific safeguarding issue – in alphabetical order

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

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

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

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family. Potential signs of adult-involved grooming and coercion can include the child or young person being:

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

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

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

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

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

Breast ironing/flattening

Breast flattening, also known as breast ironing, is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (ranging from a few weeks to years) for the breasts to disappear or delay the development of the breasts entirely. In some families, large stones, a hammer or spatula that have been heated over hot coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts to prevent them from growing. Breast flattening usually starts with the first signs of puberty, it is usually carried out by female relatives. It should also be acknowledged that some adolescent girls and boys may choose to bind their breast using constrictive material due to gender transformation or questioning their identity, and this may also cause health problems.

Health Implications -Due to the type of instruments that may be used, the type of force and the lack of aftercare, significant health and developmental issue may occur, such as: Severe pain, fever, dissymmetry or disappearance of breast/s, itching, tissue damage,

infection, discharge of milk, breast cancer, abscesses or cysts. There may also be an impact on the child's social and psychological well-being

Justifications -In many cases, the abuser thinks they are doing something good for the girl by delaying the effects of puberty and the practice is designed to: prevent pregnancy and rape, make teenage girls look less "womanly" and no-longer sexually attractive to men, enable the girl to continue her education, prevent dishonour being brought upon the family if the girl begins sexual relations outside of marriage, prevent early marriage and deter unwanted attention.

Prevalence

There has not been extensive research done on breast flattening and the few studies that have been carried out indicate that the practice occurs predominantly in Cameroon. Other countries include: Togo, Chad, Kenya, Guinea Bissau, South Africa, Cote d'Ivoire, Benin and Zimbabwe.

Signs that a girl could be at risk:

- A girl is embarrassed about her body
- A girl is born to a woman who has undergone breast flattening
- A girl has an older sibling or cousin who has undergone breast flattening
- References to breast flattening in conversation, for example a girl may tell other children about it
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- A girl from an affected community is withdrawn from PSHE and/or Sex and Relationship Education as her parents wish to keep her uninformed about her rights and her body.
- One of both parents or elder family members consider breast flattening integral to their cultural identity.
- The family indicate that there are strong levels of influence held by elders who are involved in bringing up female children and support breast flattening.

As well as keeping in mind the signs that indicate a girl may be at risk of breast flattening, professionals and others should be mindful that:

- A girl may disclose to a teacher, social worker, GP or another medical professional
- Some girls may ask for help, perhaps talk about pain or discomfort in their chest area, but may not be explicit about the problem due to embarrassment or fear
- A girl may display reluctance to undergo medical examination
- A girl may be fearful of changing for physical activities due to scars showing or bandages being visible

There are no specific laws in the UK regarding breast flattening. If you suspect a girl is at risk of/undergoing breast flattening speak to the DSL/DDSL immediately. The DSL /DDSL will contact the MASH and make a referral.

CCE - Child criminal exploitation

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines) forced to shoplift or pickpocket, or to threaten other young people. Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

New guidance in KCSIE 2026 states that

- this type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups
- most sexual abuse is committed by someone known to the victim
- children are not always recognised as victims and can be criminalised for actions they take while under coercion.

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

Child-on-child abuse

At Wednesbury Oak Academy we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children. We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's relevant policy e.g., behaviour policy.

ALL staff recognise that children can abuse their peers and that this type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two. ALL staff should be clear about the academy's policy and procedures about child-on-child abuse and the important role they must play in preventing it and responding where they believe a child may be at risk.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

ALL allegations will be taken seriously, at Wednesbury Oak Academy we understand that 'abuse is abuse and should never be passed off as "banter", "just having a laugh" or "part of growing up". We have a zero-tolerance approach to this behaviour. ALL allegations will be carefully considered, and all decisions will be made on a case-by-case basis in consultations with social care. Referrals under safeguarding arrangements may be necessary, key specific considerations will include:

- The age, maturity and understanding of the children; and
- Any disability or special needs of the children

The school recognises that child-on-child abuse is a problem and is happening, even when the issues are not reported. This sort of abuse has a serious impact on those who are victims, in terms of self-esteem and relationships but also educational outcomes.

Allegations against other children which are safeguarding issues

Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations may include physical abuse, emotional abuse, sexual abuse, sexual violence and harassment, up-skirting and sexual exploitation, causing someone to engage in sexual activity without consent; and consensual and non-consensual use of nude and semi-nude images/videos.

We understand the gendered nature of child-on-child abuse but all child-on-child abuse is unacceptable and will be taken seriously. Other gender issues that can be prevalent when dealing with child-on-child abuse could, for example, include girls being sexually touched or assaulted or boys being subject to initiation or hazing type violence. It is also likely that incidents may involve older students and their behaviour towards younger students or those who are vulnerable. It is likely that, to be considered a safeguarding allegation against a child, some of the following features will be found. If the allegation:

- Is made against an older child and refers to their behaviour towards a younger child or a more vulnerable child;
- Is of a serious nature, possibly including a criminal offence;

- Raises risk factors for other children in the school;
- Indicates that other children may have been affected by this child; and
- Indicates that young children outside the school may be affected by this child.

Examples of safeguarding issues against a child could include:

Physical Abuse

- Violence, particularly pre-planned;
- Forcing others to use drugs or alcohol; and
- Initiation and hazing violence.

Emotional Abuse

- Blackmail or extortion;
- Threats and intimidation; and
- Bullying and cyber-bullying.

Sexual Abuse including sexting and gender-based violence

- Indecent exposure, indecent and inappropriate touching or serious sexual assaults;
- Forcing others to watch pornography or consensual or non -consensual sharing of images/videos
- Initiation and hazing violence.
- Causing someone to engage in sexual activity without consent
- 'Teenage relationship abuse' is abuse in intimate personal relationships between children

Sexual Exploitation/violence and harassment

- Encouraging other children to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight); and
- Photographing or videoing other children performing indecent acts.

Prevention, assessing and minimising the risks

At Wednesbury Oak Academy we will minimise the risk of allegations against other children by:

- Providing a developmentally age appropriate PSHE, RSE, British Values curriculum which develops children's understanding of acceptable behaviour and keeping themselves safe;
- Having clear systems in place for any child to raise concerns with staff, knowing that they will be taken seriously
- Delivering targeted work on assertiveness, protective behaviours and keeping safe those children identified as being at risk;
- Developing robust risk assessments and providing targeted work for children identified as being a potential risk to other children; and
- Training and awareness sessions will be provided for staff.
- Staff recognising, acknowledging or understanding the scale of harassment and abuse and not downplaying some behaviours related to abuse which can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenario a cultural that normalises abuse and leading to children accepting it as normal and not coming forward to report it report it.

Procedure to manage and record child-on-child allegations

- When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the designated safeguarding lead or deputy will be informed;
- A factual record will be made of the allegation, but no attempt at this stage should be made to investigate the circumstances;
- The designated safeguarding lead or deputy will contact social care/multi-agency agency safeguarding hub (MASH) to discuss the allegation and seek advice;
- The designated safeguarding lead or deputy will follow through the outcomes of the discussion and make a referral where appropriate;
- If the allegation indicates that a potential criminal offence has taken place, this will be referred to the multiagency agency safeguarding hub MASH where the police will become involved;
- Following advice from Social Care and/or the police, parents of both the child being complained about and the alleged victim, should be informed and kept updated on the progress of the referral;
- The designated safeguarding lead or deputy will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files;

- It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures;
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual behaviour procedures;
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan; and
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.
- Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously.

Support and care

At Wednesbury Oak Academy we recognise and understand that child-on-child allegations will be very distressing situations for all concerned – the victim, perpetrator, other children, family members and staff. We will seek to provide any support required and make any necessary referrals for counselling and support services.

Child-on-child sexual violence and harassment

If an incident of sexual violence or sexual harassment occurs at our school will follow the guidance set out in Part 5 of Keeping Children Safe in Education 2026.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal), inside or outside of school and are never acceptable. At Wednesbury Oak Academy we take a zero-tolerance approach and any inappropriate behaviour will be addressed, even if it appears to be relatively innocuous.

At Wednesbury Oak Academy all victims will be taken seriously and offered appropriate support. We know that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff are aware and know the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. This covers a wide range of behaviours so a single act of kissing someone without consent, can still constitute sexual assault.

Consent

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

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

Sexual harassment

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. For this policy, reference to sexual harassment, is in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity,

and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. 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 (we will consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of sexual images and videos;
- sharing of unwanted explicit content
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online

We will consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour
Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors.

The designated safeguarding lead (and their deputies) to have a good understanding of HSB. This will form part of their safeguarding training. This will aid in our planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Preventing abuse Effective safeguarding practice is demonstrated when we are clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. The DSL (or a deputy) will understand local procedures and where there is local specialist support.

Our school response to a report of sexual violence or sexual harassment

Our school will follow the guidance set out in part 5 Keeping Children Safe 2026:

- Any decisions made upon receipt of a concern will be made on a case-by-case basis by the designated safeguarding lead or deputy who will liaise with social care and or the police if necessary.
- All staff who have a concern regarding sexual violence or sexual harassment will speak with and report their concern to the designated safeguarding lead or deputy immediately
- All victims will be reassured that they are being taken seriously and they will be supported.
- It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- All staff will act in the best interest of the students
- Our staff will be supportive and respectful of the student
- Our staff will listen carefully to the student, they will be non-judgemental and will not ask leading questions
- Our staff will not promise confidentiality and will explain that the information will be shared with those people who will be able to help and progress the report.
- A record of the report will be made. Best practice is to wait until the end of the report and immediately write up a thorough summary. It may be appropriate to make notes during the report however staff must remain engaged with the students, listen very carefully and not be distracted by note taking.

- The record will only include the facts as the student presents them. We understand that the notes should not reflect the personal opinion of the note taker and we are aware that the notes could become part of a statutory assessment by social care or part of a criminal investigation
- Where the concern includes an online element, we know we should not view or forward any images unless there is a valid reason to do so and we will follow the DfE guidance set out in Screening, searching and confiscation advice.
- Where possible we will try to manage and record an initial report with two members of staff present preferably one of them being the designated safeguarding lead or deputy.
- If the designated safeguarding lead or deputy is not involved in the initial report the staff member will speak to the designated safeguarding lead or deputy immediately.

Considering confidentiality and anonymity

We will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation. The victim may ask us not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes are to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice will be sought from the designated safeguarding lead (or deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will be explained to the victim and appropriate specialist support should be offered.

Anonymity
Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, we should be aware of anonymity, witness support and the criminal process in general so we can offer support and act appropriately.

We will so all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Risk assessment

If we receive a report of sexual violence or harassment, the designated safeguarding lead or deputy will make an immediate risk and needs assessment. This will be considered on a case-by case basis. Our risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there have been other victims
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at our school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms.
- The time and location of the incident, and any action required to make the location safer.

Our risk assessment will either be a written record and will be reviewed and updated regularly. We will continually and actively consider the risks posed to all children/students and we will put adequate measures in place to protect and keep them safe.

Our designated safeguarding lead or deputy will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the academy's approach to supporting and protecting our children/students and will be used to update our own risk assessment.

Actions to consider following a report of sexual violence and/or sexual harassment

The starting point regarding any report made at Wednesbury Oak Academy is that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. We will not pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Following a report of sexual violence and/or harassment we will consider:

- the wishes of the victim in terms of how they want to proceed (in an age-appropriate way.) This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forma of abuse and a sustained pattern may not just be of a sexual nature)
- Importance of understanding intra familial harms and any necessary support for siblings following incidents
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context e.g., contextual safeguarding, any links to CSE and CCE

Managing a report

We will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, generally, our school will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this will not stop our school taking immediate action to safeguard our children, where required.

Our academy will consider four likely scenarios when managing any reports of sexual violence and/or sexual harassment. We will either manage the report:

1. Internally
2. Consider early help
3. Refer to social care
4. Report to the police

In all scenarios decisions and actions will be regularly reviewed and relevant policies will be updated to reflect lessons learnt. We will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. We will consider whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. Wednesbury Oak Academy should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

Considering bail conditions

Our academy will have due regard for the information available in KCSIE part.

- When there is a criminal investigation, without bail conditions, our academy will work with children's social care and the police to support the victim, alleged perpetrator and other students involved (especially potential witnesses). Where required, we will seek advice from the police to help our academy manage our safeguarding responsibilities.
- The term 'Released Under Investigation' or 'RUI' will replace those previously on bail for offences in circumstances that do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.
- Where bail is deemed proportionate and necessary, our academy will work with children's social care and the police to manage any implications and safeguard our children/students. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.
- Regard will be given to the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management

measures strike a balance between management of risk and the rights of an unconvicted person (e.g., rights to privacy, family life, etc).
- Careful liaison with the police investigators should help to develop a balanced set of arrangements

Managing any delays in the criminal process

- There may be delays in any case that is being progressed through the criminal justice system. Our Schools/colleges will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the school or college. We will use a risk assessment to help inform any decision.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, our designated safeguarding lead or deputy will work closely with the police (and other agencies as required), to ensure any actions our school/college take do not jeopardise the police investigation.
- If our school/college has questions about the investigation, we will ask the police.

The end of the criminal process

If a student is convicted or receives a caution for a sexual offence, our school/academy will update our risk assessment, ensure relevant protections are in place for all the students at our academy and, we will consider any suitable action considering our behaviour policy. If the perpetrator remains in our academy with the victim our academy will be very clear as to our expectations regarding the perpetrator, now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the academy thinks are reasonable and proportionate regarding the perpetrator's timetable.

We will ensure both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfound, false and malicious reports

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing
Safeguarding and supporting the victim. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the victim.

- The age and the developmental stage of the victim
- The needs and wishes of the victim will be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority will be to make the victim's daily experience as normal as possible, so that our school/college is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- We are aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC).
- It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or

inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victims. We will respect and support this choice.

We are aware that sexual assault can result in a range of health needs, including physical, mental and sexual health problems and unwanted pregnancy. We understand that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While we will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

We will do everything we reasonably can to protect the victim from bullying and harassment because of any report they have made. Whilst the victim will be given all the necessary support to remain in our academy, if the trauma results in the victim being unable to do this, alternative provision or a move to another academy should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs. The designated safeguarding lead will take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. We will remain alert to the possible challenges of detecting those sighs and show sensitivity to the needs of the child (e.g., about attendance in lessons) irrespective of how overt the child's distress is.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

We will have a difficult balancing act to consider. On one hand, we need to safeguard the victim (and the wider pupil body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any sanctions.

The age and the developmental stage of the alleged perpetrator(s) and nature of the allegations. Any child will likely experience stress because of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice, as appropriate, from children's social care, specialist sexual violence services and the police.

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Advice on behaviour in schools is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made.
It is important that if the alleged perpetrator(s) does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

Working with parents and carers

We will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. We will carefully consider what information we provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and will work with the relevant agencies to ensure a consistent approach.

We will meet the victim's parents or carers, with the victim present, to discuss what arrangements are being put into place to safeguard them and to understand their wishes in terms of support and how the report is progressing.

We will meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions will be explained. Support for the alleged perpetrator will be discussed.

Safeguarding other children

Consideration will be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following a report of sexual violence or sexual harassment, it is likely that some children will take "sides". The we will do all we can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed – this includes online and school transport.

Our whole school approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at Wednesbury Oak Academy are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

We will keep our policies, processes, and curriculum under constant review to protect all their children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and will be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in school may also be reflective of the wider issues within a local area and it would be good practice to share emerging trends with our safeguarding partners.

Childhood Mental Health

At Wednesbury Oak Academy we are aware that mental illness and suicidal thoughts can affect anyone, of any age, of any background, at any time. It can be difficult to know if a child is suffering as they often keep it to themselves, but we know some characteristics for childhood mental health may be:

- Becoming withdrawn from family and friends
- Persistent low moods and unhappiness
- Tearfulness and irritability
- Worries that stop them carrying out day to day tasks
- Sudden outbursts of anger directed towards others or themselves
- Loss of interest in activities that they used to enjoy
- Problems eating or sleeping

In our school this means that:

- All staff will be alert to signs of mental ill-health and be 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
- All staff will take immediate action and speak to a DSL (and record their concerns via CPOMS if they have a mental health concern about a child that is also a safeguarding concern)
- We our take seriously our organisational and professional role in supporting and promoting mental health and wellbeing of children/young people through:
- **Prevention**: creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos;
- **Identification:** recognising emerging issues as early and accurately as possible;
- **Early support:** helping pupils to access evidence based early support and interventions; and
- **Access to specialist support**: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

New guidance in KCSIE 2026 states:
The role of education staff is not to diagnose mental health problems, but that staff can help to fulfil four key roles:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing or at risk of developing mental health problems
- making sure early targeted support is provided

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by the local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Our school will use the age-appropriate guides to support children, 5–11-year-olds and 12–17-year-olds. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. Our school will use the Ministry of Justice online child arrangements information tool to support this process and will make this information available to parents and carers if they require our assistance.

Children who are absent from education

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

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

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

Our academy has appropriate safeguarding policies, procedures and responses for children who are absent from education. Our school has an admission register and an attendance register. All children are placed on these registers at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend our school. If the child fails to attend on the agreed or notified date, our school will notify the local authority at the earliest possible opportunity to prevent the child from going missing.

Our attendance and admission registers are kept up to date. We actively encourage our parents and carers to inform us of any changes whenever they occur.

Our academy monitors attendance regularly and we address any issues that may cause concern and where attendance fails to meet the expected level.

Our academy will notify the local authority of any child who fails to attend academy regularly or has been absent without the school's permission for a continuous period of 10 school days or, more at such intervals as are agreed by the academy and the local authority.

Where a parent notifies our school that a pupil will live at another address, our academy will record in the admission register:

- the full name of the parent with whom the pupil will live;
- the new address; and
- the date from when it is expected the pupil will live at this address.

Where a parent of a pupil notifies our school that the pupil is registered at another school or will be attending a different school in future, our school will record in the admission register:

- the name of the new school; and
- the date on which the pupil first attended or is due to start attending that school.

Our academy will notify the local authority within five days when a pupil's name is added to the admission register. We will provide the local authority with all the information held within the admission register about the pupil.

Our academy will also notify the local authority when a pupil's name is to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register.

Our academy will only delete a pupil's name from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if our school and the local authority have failed to establish the pupil's whereabouts after jointly making reasonable enquiries.

When our school notifies the local authority that a pupil's name is to be deleted from the admission register, our school will provide the local authority with:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;
- the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the ground in regulation 8 under which the pupil's name is to be deleted from the admission register.

Our academy will work with the local authority to agree on methods of making returns. When making returns, we will highlight to the local authority where we have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. We will also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is missing education, such as any safeguarding concerns.

Our school uses a secure internet system – school2school – we use this to transfer pupil information to another school when the child moves. As a maintained school, we are required, when a pupil ceases to be registered at our school and becomes a registered pupil at another school in England or Wales, to send a Common Transfer File (CTF) to the new school. Our academy complies with this requirement. If a child arrives at our school and the previous school is unknown, we will contact the local authority for assistance.

It is essential that schools comply with these duties, so that local authorities can, as part of their duty to identify children of compulsory school age who are absent from education, follow up with any child who might be at risk of not receiving an education and who might be at risk of being harmed, exploited or radicalised. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Children with family members in prison

Some children who attend our school may have a parent who has been sent to prison. Our school will utilise the information NICCO provides designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Consensual and non-consensual sharing of nudes and semi-nudes and/or videos

At Wednesbury Oak Academy we know and understand that sharing photos and videos online is part of daily life for many children, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text

messages, email, posted on social media or increasingly via mobile messaging apps, such as, Snapchat, WhatsApp or Facebook Messenger, etc.

The increase in the speed and ease of sharing imagery has brought concerns about students producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying, sexual harassment and increased vulnerability to sexual exploitation. Although the production of such imagery will likely take place outside of our academy, these issues often manifest in schools and organisations working with children and young people. Wednesbury Oak Academy will respond swiftly and confidently to ensure that children are safeguarded, supported and educated. Producing and sharing sexual images of **under-18s is also illegal.**

Wednesbury Oak Academy will deal with all incidents as a safeguarding concern. We will be guided by the principle of proportionality and our primary concern will be the welfare and protection of the children involved. Our school may respond to incidents without involving the police in accordance with the guidelines set out in the UKCCIS- Sexting in schools and colleges: responding to incidents and safeguarding young people.

Wednesbury Oak Academy will adopt the recommended procedures regarding the law and handling incidents outlined in UKCCIS- Sharing nudes and semi-nudes; advice for education settings working with children and young people and DfE guidance – Searching, screening and confiscation

Whilst dealing with an incident Wednesbury Oak Academy will:

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

County lines

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

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

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

CSE - Child sexual Exploitation

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

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

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

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

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

At Wednesbury Oak Academy we are aware that the following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

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

We understand that not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present. Children rarely self-report child sexual exploitation so we understand it is vitally important that all staff at Wednesbury Oak Academy are aware that some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;

- children who go missing for periods of time or regularly come home late; and
- children who regularly absent from education or do not take part in education.

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

At Wednesbury Oak Academy we will provide information and raise awareness of CSE including the signs, vulnerabilities and reporting procedures in line with WST guidelines. Our staff will report any concerns regarding children at risk of CSE to the designated safeguarding lead or deputy who will then make a referral and liaise with other relevant statutory agencies, for example, social care, police and health professionals as required. We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines and sexual exploitation).

New guidance in KCSIE 2026 states that

- this type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups
- most sexual abuse is committed by someone known to the victim
- children are not always recognised as victims and can be criminalised for actions they take while under coercion.

Cybercrime

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

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

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme.

Domestic Abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. ALL staff will speak to the designated safeguarding lead or deputy about any concerns about female genital mutilation. The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. **Those failing to report such cases will face disciplinary sanctions.**

It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with our academy designated safeguarding lead or deputy and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow local safeguarding procedures.

At Wednesbury Oak Academy teachers must also report their concerns and share the information with the designated safeguarding lead or deputy following the school's procedures for recording and reporting. The teacher will be supported by the designated safeguarding lead, to fulfil their duty to report FGM cases to the police and social care.

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. When required our designated safeguarding lead or deputies will obtain contact details and know referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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

'Honour Based Abuse'

So-called 'honour-based' Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff will be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

If our staff have any concerns regarding a child that might be at risk of HBA or who has suffered from HBA they will speak to the designated safeguarding lead or deputy. As appropriate the designated safeguarding lead or deputy will activate the local safeguarding procedures by contacting the police and or social care.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

Our school will make use of the advice and links available in Keeping Children Safe in Education (Annex B) to identify and support children who are affected by domestic abuse and how they can be helped.

Private Fostering Arrangements

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18 if disabled) who is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer; for 28 days or more. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts, (whether of full blood, half blood, or marriage/ affinity.)

Academy staff will notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements. The designated safeguarding lead or deputy will speak to the family of the child involved to check that they are aware of their duty to inform the LA.

Our academy is aware that we need to report any private fostering arrangements that we become aware of to the Local Authority. On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered and where reasonably possible we will obtain more than one emergency contact number.

Radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

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

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

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

At Wednesbury Oak Academy we aim to build the children's resilience to radicalisation by providing a safe environment and through aspects of the curriculum including SMSC, British Values, PSHE, RSE and Citizenship.

Training on Prevent will be delivered as required to the relevant staff. Our school will use the e-learning links outlined in KCSIE if required. Our school will utilise The Department for Education advice for schools on the Prevent duty and other links and guidance outlined in KCSIE. Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including (for example curriculum policy, Preventing Extremism and Radicalisation Policy, Behaviour for learning and relationships policy, e-safety policy).

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

Our staff will co-operate with local Channel panel as required. Our school will contact the Wolverhampton Community Safety Team at: safer@wolverhampton.gov.uk or call: 01902 551214

Self-harm and suicidal ideation

'Self-harm' means injuring yourself deliberately. It's most often associated with cutting, but can also involve burning, hitting or punching, substance use, or eating disorders

A child may self-harm:

- As a coping mechanism, to feel more in control or to deal with negative or overwhelming feelings
- As a form of release – to change emotional pain into physical pain, or to relieve feelings of numbness, anger or aggression
- To punish themselves
- To send a sign that they're distressed
- Ultimately, it's a visible sign that something is not right

When someone self-harms, their body releases a rush of chemicals, giving them an unnatural sense of calm. This gives them some respite from their feelings. But the episode is normally followed by an extreme low, with guilt and shame. Self-harming can begin at any age, although it most commonly starts between 13 and 15. While any child could be at risk, there are some factors that put some children more at risk than others. Triggers could include (this list is not exhaustive):

- Bullying
- Family breakdown
- Pressure to do well at school
- Influence of media and peer groups, which may appear to glamourise self-harm
- Feeling rejected, having a poor self-image, and self-blame
- Bereavement
- Having a traumatic experience
- Having a learning difficulty

Some of the signs of potential self-harm are the same as for other safeguarding or mental health issues, for example:

- Having unexplained accidents or injuries that look like they could be self-inflicted, including cuts, bruises or cigarette burns on wrists, arms, thighs and chest
- Covering up, even in warm weather, and avoiding situations where they might be expected to wear more revealing clothing or take clothing off (for example, not taking off jumpers for PE)
- Having sharp items in their belongings
- Expressing self-loathing and a desire to hurt or punish themselves
- Changes in socialising, eating and sleeping patterns: for example, becoming withdrawn and isolated, blaming themselves for problems, unusual weight loss or gain, which they might try to hide by wearing loose clothing or being secretive about eating
- Low self-esteem, isolation, irritability and mood changes

- Not doing as well at school
- Losing interest in hobbies

The term 'suicidal ideation' essentially means 'having suicidal thoughts. These could range from a child having passive or abstract thoughts about ending their life or feeling that people would be better off without them, to thinking about methods of suicide and actively making a plan to do it. Any child could be at risk, but there are some triggers that can make some children more at risk than others. Some of the triggers that are most likely to put a child at risk are:

- Family breakdown
- Relationship problems (with friends, family or peers)
- Bereavement
- School problems and test pressures
- Bullying, including cyber-bullying
- Having a family history of suicide
- Physical illness
- Physical and sexual abuse
- Sexuality

While there are many different potential triggers, the shared point across them is that a child is struggling to cope with a problem or issue in life and can't see a way out of it. Please note that some of these triggers are the same as for self-harm: family breakdown, bullying, and school problems and test pressures.

Staff will:

- Report their concerns to the DSL and/or mental health lead, in line with school policy
- Speak to the child and listen to them to find out more about what's going on for them, so the child can get any further professional help they need

When it comes to talking to a child:

- It's best for a member of staff with a good relationship with the pupil to do this
- If staff are uncertain about having the conversation, or have personal experiences of self-harm or have personal experiences of suicide, they should speak to the DSL or mental health lead for support
- If staff feel confident and have concerns about a child, they shouldn't wait for the DSL or mental health lead and miss an opportunity to talk to the pupil. For example, if a staff member works closely with the pupil and notices something that they're concerned about, they should go ahead and speak to the child first, and fill the DSL in afterwards, so they don't potentially miss an opportunity to help the child
- The mental health lead or DSL will co-ordinate a plan of action, including making a referral to child and adolescent mental health services (CAMHS) if needed

If a mental health concern is also a safeguarding concern staff will take immediate action and follow our safeguarding procedures to report it. If a child is in immediate danger, for example if your member of staff think a child is going to harm themselves, they should stay with the child, talk to them, and get support from the DSL as soon as possible. If the DSL isn't available, they can make a referral to children's social care, CAMHS or the child's GP themselves, or call 999 if appropriate. Similarly, if a child needs medical attention, they should get it either within school or by calling 999.

Serious violence

All staff should be aware of indicators which may signal children are at risk from or involved with serious violent crime. These may include - increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these (more information can be found in Home Office guidance).

There are several indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

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

Staff should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Up-Skirting

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

Other types of abuse to be aware of include: • Bullying • Drugs • Fabricated and Induced illness • Faith abuse • Gangs and youth violence • Gender based violence/violence against women and girls • Hate • Trafficking • Modern slavery • Adverse childhood experiences.

Whilst it is important for our staff to be always vigilant regarding the types and signs of abuse it does not necessarily mean that a child or young person has been abused because the signs have been noted or observed. However, **ALL concerns MUST** be shared with the designated safeguarding lead or deputy.

Appendix 8 - Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and switch off their mobile phone during visits.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the electronic system and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Appendix 9 - Non-collection of children

If a parent/carer is late to pick up their child and has contacted school to say so, their child will be placed in an after-school club which parents will be charged for.

If a child is not collected at the end of the session/day, and school cannot get in contact with the parent/carer then a referral to Sandwell Children's Trust will be made.

Appendix 10 - Missing pupils

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

Inform parents/carers and notify the Police.

Appendix 11 - Use of mobile technology EYFS

EYFS Policies should be in line with the guidance and procedures of the relevant local safeguarding partners (LSP). Policies must cover the use of mobile phones and cameras in the setting.

In order to use mobile technology safely, at Wednesbury Oak Academy:

Staff use and personal phones

- Personal devices must be switched off and stored away during any timetabled contact time. Staff may check mobile phones during their lunch break and not in the presence of any children. In line with our Code of Conduct.
- At all other times, mobile phones can only be used beyond the school office doors (staffroom area or SLT offices). If staff need to be contacted during the school day in an emergency, they will need to speak with the Headteacher first to gain permission. If the Headteacher is not available the DSL will need to be spoken to. The Headteacher/DSL will make a record of anyone who has asked permission to have their phones out during the school day.
- Photographs must not be taken of the children on any personal phones or any other personal information storage device. Only School-owned devices can be used to take photographs or videos.
- Staff must not use personal mobile phones to communicate with parents/carers or give out their personal mobile numbers or email addresses.
- Staff who bring personal mobile phones into the provision must ensure that there is no inappropriate or illegal content on them.
- The school setting is not responsible for the loss, damage or theft of any personal mobile device.
- All members of staff should remain vigilant and report any concerns to the setting's manager or designated safeguarding lead (DSL). Parents and staff should be informed of the complaints procedure and staff made aware of the whistleblowing procedure.
- If a member of staff breaches the mobile phone policy, action will be taken in line with the staff code of conduct and allegations policy.
- If a member of staff is thought to have illegal content on a mobile phone or have committed a criminal offence using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed.

Use of school's mobile phones and devices

- The school's mobile phones, tablets or laptops must only be used by members of staff for work purposes.
- The school's devices will not have any social media or messaging apps on them.
- SLT must ensure any apps downloaded onto nursery devices are age and content appropriate for the children or staff using them.
- Passwords or passcodes for nursery devices must not be shared or written down and will be changed regularly.
- Mobile phones and devices belonging to the school will always be used in accordance with the acceptable IT use policy and activity may be monitored for safeguarding reasons and to ensure policy compliance.
- During outings, staff will only use mobile phones belonging to the school wherever possible.
- Parental permission will be obtained on joining the school for the use of photographs or videos of children and consent should be sought every 12 months.
- Staff are provided with photography permission information to ensure parents' wishes are adhered to.
- Staff are aware of pupils who do not have photography permission and, when using
- external providers, they are informed of this.
- Only school staff will have access to images due to increased logging on rights.
- Any images or videos of children will be stored securely and deleted when no longer required.
- All images are printed or reproduced at the school to ensure that photos and recordings of the children cannot be used inappropriately.
- Nursery devices must not be taken home with staff and must remain secure at the setting when not in use.

Parents and visitors

To protect children in the early years, our school do not allow parents or visitors to use their mobile phones in the classroom. Visitor's will be informed of the policy before they visit or on arrival. Members of staff should challenge visitors if they have concerns about their use of mobile phones or other devices and inform SLT or the DSL team of any breaches of policy.

Parents are advised that children cannot bring into the setting any devices that may take photographs or videos, such as phones or smart watches, to ensure that everyone is safeguarded and to protect personal property from loss or damage.