



MODEL SAFEGUARDING AND CHILD PROTECTION POLICY FOR SCHOOLS AND EDUCATION SERVICES

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V.1

**Produced by the Safeguarding in Education Team for Bedford Borough Council/Luton/
Central Bedfordshire**

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School acknowledgement

At **Woodland Middle School**, we are committed to safeguarding and child protection in line with the statutory guidance.

As required, all staff have read and understood part one of Keeping Children Safe in Education 2025.

The DSL is: Sérgio Matias

The Deputy DSL are: Jeff Conquest, Sharon Hardacre and Emma Gibson

The Safeguarding Officers are: Year Leaders

The Safeguarding Governor is: Sam Auburn

The Prevent SPOC is: Sérgio Matias

The Operation Encompass SPOC is: Sérgio Matias

The LADO is Stephen Lagan, Sian Clery and Laura Davies: LADO@centralbedfordshire.gov.uk

Access and Referral HUB Tel: 0300 300 8585 during office hours 0300 300 8123 out of hours
[Child protection - safeguarding children and young people | Central Bedfordshire Council](#)

Local Multi Agency Safeguarding Arrangement

Note:

The Children and Social Work Act 2017 (the Act) replaces Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and **relevant agencies** they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children/young people in their area. Education is one of the relevant agencies.

[Safeguarding Bedfordshire](#)

PART ONE: SAFEGUARDING POLICY

Ratified by the Governing Body: **September 2025**

To be reviewed (annually): **September 2026**

1. Introduction

1.1 Safeguarding is defined as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing the 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.

1.2 Child Protection is defined as:

- activity that is 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. ([Working Together, DfE 2023](#))

This includes, but is not limited to safeguarding children/young people in specific circumstances:

- Neglect
- Emotional abuse
- Bullying, including online and prejudice-based bullying
- Gender based violence/violence against women and girls
- Child Sexual Exploitation and trafficking
- Teenage relationship abuse
- Gang/youth violence including initiation/hazing
- Female Genital Mutilation
- Fabricated/induced illness
- Online including grooming via social networking, online gaming, video messaging
- Physical abuse
- Sexual abuse
- Racist, disability and homophobic or transphobic abuse
- Radicalisation and/ or extremist behaviour
- Honour Based Abuse
- Child on Child abuse
- Substance abuse
- Domestic abuse/violence
- Forced marriage
- Poor parenting
- The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual Imagery

- Self-harm behaviours
- Upskirting
- Children/young people with mental health difficulties or illness
- Contextual/Extra familiar risks
- Exploitation

Woodland Middle School are committed to safeguarding and promoting the welfare of all its children/young people. We believe that:

- all children/young people have an equal right to be protected from harm.
- children/young people need support which matches their individual needs, including those who may have experienced abuse.
- all children/young people have the right to speak freely and voice their values and beliefs.
- all children/young people must be encouraged to respect each other's values and support each other.
- all children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs.
- schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours (behaviours which may be perceived to be 'risky')
- all staff, volunteers and visitors have an important role to play in safeguarding children/young people and protecting them from abuse.

Woodland Middle School will fulfil their local and national responsibilities as laid out in the following documents:

- [Working Together to Safeguard Children \(DfE, 2023\)](#)
- [Keeping children safe in education 2025](#)
- [Information Sharing \(DfE 2024\)](#)
- The procedures of the Pan Bedfordshire and Safeguarding Adults Boards [Contents](#)
- [Working together to improve school attendance - GOV.UK](#)
- [The Children Act 1989](#)
- [Education Act 2002](#) (s175 / s157)
- [What to do if you are worried a child is being abused \(DfE, 2015\)](#)
- [Use of reasonable force in schools \(DfE, 2013\)](#)

- [Mental health and behaviour in schools: departmental advice \(DfE, 2018\)](#)
- [Preventing and tackling bullying: Advice for Head teachers, staff and governing bodies \(DfE, 2017\)](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)
- [Terrorism \(Protection of Premises\) Act 2025: factsheets - GOV.UK](#)
- [Serious Crime Act 2015](#)
- [Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety, 2016\)](#)
- [Criminal exploitation of children and vulnerable adults county lines \(Home Office guidance 2023\)](#)
- [Children missing education \(DfE, 2016\)](#)
- [Statutory guidance on children who run away or go missing from home or care \(DfE, 2017\)](#)
- [Child sexual exploitation: definition and guide for practitioners \(DfE, 2017\)](#)
- [The Domestic Abuse Act 2021](#)
- [Drugs \(DfE and ACPO guidance\)](#)
- [Sharing nudes and semi-nudes: advice for educational settings \(2024\)](#)

2. The Designated Safeguarding Lead

Our Designated Safeguarding Lead **Sérgio Matias**, is a member of the Senior Leadership Team and takes lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children/young people in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children/young people's attendance, engagement and achievement at school.

They will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the Early Help Team, Children's Social Care, health, police etc.

The Designated Safeguarding Lead is supported by the following Deputy Designated Safeguarding Lead/s:

Jeff Conquest, Sharon Hardacre and Emma Gibson

The Deputy Designated Safeguarding Lead/s are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring).

The Designated Safeguarding Lead is supported in developing knowledge and skills to:

- encourage a culture of listening to children/young people and taking account of their wishes and feelings, among all staff, and in any measures the school put in place to protect them.

- understand the difficulties that children/young people may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

When the school has concerns about a child/young person, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with the threshold document ([thresholds document](#)) and initiate a response accordingly. This may include providing a single agency early help response, undertaking an Early Help referral or a referral to Children’s Social Care for a statutory social work assessment. The Head Teacher/Principal will be kept apprised of cases as appropriate.

The DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with [Working Together to Safeguard Children \(2023\)](#), [when to call police](#) should help the DSL understand when they should consider calling the police and what to expect if they do so.

For further information on the roles and responsibilities of the DSL, please see Appendix One.

The DSL will not disclose to a parent any information held on a child/young person if this would put the child at risk of significant harm. In such circumstances, advice will be sought from Children’s Social Care.

If a child/young person moves from our school, the DSL will ensure child protection records are forwarded on to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records.

The DSL shall ensure the child protection files are transferred to the new school 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 to allow the new school or college to have support in place for when the child/young person arrives (KCSiE 2025).

The DSL will also consider if it would be appropriate to share any information that would allow the new school or setting to continue supporting children/young people, in advance of the child/young person leaving.

Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. The DSL will record where and to whom the records have been passed and the date. We will ensure secure transit and obtain a confirmation of receipt.

If sending by post, children/young person’s records will be sent by “Special/Recorded Delivery”. For audit purposes, a note of all children/young people’s records transferred or received should be kept in either paper or electronic format. This will include the child/young person’s name, date of birth, where and to whom the records have been sent and the date sent and/or received.

- If a child/young person is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation.
- If a child/young person is being removed from school roll in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team.

- Where a vulnerable child/young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.
- When a DSL resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder - this exchange should be recorded as part of the incoming role holder's induction/performance management.
- In exceptional circumstances when a face-to-face handover is not feasible, the Head Teacher / Principal will ensure that the new post holder is fully conversant with all procedures and case files.

3. Overall Aims

This Policy will contribute to safeguarding our children/young people and promoting their welfare by:

- Clarifying standards of behaviour for staff and children/young people.
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values.
- Creating an organisational culture that is safe for children/young people.
- Introducing appropriate work within the curriculum.
- Encouraging children, young people and parents to participate.
- Developing staff's awareness of the risks and vulnerabilities children/young people face to enable them to recognise and respond to concerns.
- Addressing concerns at the earliest possible stage in the least intrusive way.

4. Key Principles

- Always see the child/young person first and consider what life is like for them, maintaining a culture of vigilance.
- Provide support and intervention at the earliest possible opportunity in the least intrusive way [Early Help](#).
- Have conversations, build relationships and maintain professional curiosity.
- Focus on securing improved outcomes for children/young people.
- Build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children/young people.
- Every child/young person is entitled to a rich and rounded curriculum.

- When issues arise, Head Teachers/Principals should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures.

5. Key processes

All staff should be aware of the guidance issued by the Safeguarding Children Partnerships (SCP's) within the Threshold of need Guide in order to secure support and intervention for children/young people at the earliest possible opportunity in the least intrusive way. This document is integral to safeguarding children/young people in Central Bedfordshire's educational establishments and we will always use the [Threshold Document](#) to underpin decision-making.

6. Expectations

All staff and regular visitors will:

- Be familiar with this safeguarding policy and implement this consistently in the course of their work with children/young people.
- Be aware of the role and identity of the Designated Safeguarding Lead/s and Deputies for the school.
- Refer child protection concerns to Children's Social Care in the absence of the DSL and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- Be involved in the implementation of individual education programmes, Early Help/ assessments and TAF Support Plans, Child in Need plans and Child Protection plans.
- Be alert to signs and indicators of safeguarding concerns and possible abuse.
- Record concerns and pass the record to the DSL, or a member of the Safeguarding Team.
- Recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the SCPs.
- Deal with a disclosure of abuse from a child/young person in line with the guidance in Appendix Four.
- All staff and Governors will receive 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) at the point of induction - this will be updated annually.
- The DSL together with named Deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will

utilise these [training opportunities available from the SCPs](#) and other organisations as agreed by the governing body - this training will be regularly updated at a minimum of two-yearly intervals.

- In addition to the above, all staff will receive annual safeguarding updates, which may include E-learning, circulation of information and guidance internally, staff meetings, inset training.
- The subject / topics for training and updates will take into consideration SCP's priorities, local context, and needs of our pupils and identified training needs of staff.

7. The Governing Body

The Governing Body will ensure that they comply with their duties under legislation. They will have regard to [Keeping children safe in education 2025](#) to ensure that the policies, procedures and training in our school are effective and comply with the law at all times.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

The nominated governor for child protection at the school is Sam Auburn.

The nominated governor is responsible for liaising with the Head Teacher/Principal and DSL over all matters regarding child protection issues. The role is strategic rather than operational; they will not be involved in concerns about individual children/young people.

Please see Appendix Two for more information on the roles and responsibilities and of the Governing Body.

8. A Safer School Culture

The culture at **Woodland Middle School** is one that is safe for children/young people and unsafe for adults that may pose a risk to children/young people. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Head Teacher when concerns relate to an adult.

The school has a culture of listening to and hearing the voice of the child/young person.

9. Inspection

- From September 2023, Ofsted's inspections of early years, schools and post-16 provision will be carried out under: [Ofsted's Education Inspection Framework](#).
- **Woodland Middle School** will be aware of the inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding children/young people and learners are effective.
- The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools and will also report on safeguarding procedures. ISI has a published framework which informs how they inspect at Independent Schools.

10. Safer Recruitment and Selection

The school pays full regard to [Keeping children safe in education 2025](#). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions.

Woodland Middle School acknowledge that S128 checks should be completed on those members of staff and Governors taking part in management. A section 128 would prohibit someone from:

- serving as a governor of a maintained school
- holding a management position in an independent school, academy or free school as an employee
- becoming a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school
- becoming a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
- all recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children/young people.

Jeff Conquest, Sharon Hardacre and Anna Knudsen have undertaken Safer Recruitment training. One of the above will be involved in **all** staff/volunteer recruitment processes and sit on the recruitment panel.

Woodland Middle School have decided to carry out online searches for shortlisted candidates as part of due diligence in our recruitment process, (as per KCSIE, paragraph 226).

The searches are conducted by Anna Knudsen

This is recorded with the interview notes by the SBM

The process will be consistent, transparent, and fair and reflected within the Safer recruitment policy.

11. Operation Encompass

At **Woodland Middle School**, we are working in partnership with Central Bedfordshire Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called [Operation Encompass](#).

The system ensures that when the police are called to an incident of domestic abuse, where there are children/young people in the household who have seen, heard or experienced the domestic incident, the police will inform the key adult (usually the DSL or Deputy DSL) in school before they arrive at school the following day.

This ensures that the school has up to date relevant information about the child/young person's circumstances and can enable immediate support to be put in place, according to their needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools will make a referral to local authority Children's Social Care if they are concerned about a child/person's welfare.

Woodland Middle School has an information sharing agreement in place with Bedfordshire Police for Operation Encompass.

Woodland Middle School will receive Missing Persons notifications should a child/young person go missing, in line with the addition to Operation Encompass.

12. Our Role in the Prevention of Abuse

In accordance with [Working Together 2023](#), the school recognises the need to safeguard children/young people from abuse.

Appendix Three contains more information about definitions and indicators of abuse, specifically:

- neglect
- emotional abuse
- physical abuse
- sexual abuse

In addition, the school are alert to the need to safeguard children/young people in specific circumstances as defined within [Keeping children safe in education 2025](#).

Our safeguarding policy cannot be separated from the general ethos of the school, which ensures that children/young people are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

13. The Curriculum

Woodland Middle School acknowledge preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

Woodland Middle School have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by our 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. Such a programme is fully inclusive and developed to be age and stage of development appropriate (especially in considering the needs of children/young people with SEND and other vulnerabilities).

Woodland Middle School has regard for the new statutory guidance [Relationships Education, Relationships and Sex Education and Health Education guidance](#) which has been revised for introduction in September 2026.

This program will tackle at an age-appropriate stage issue such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it

14. Online Safety

Woodland Middle School understand the importance of children being safeguarded from potentially harmful and inappropriate online material. Our whole school and college approach to online safety aims to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We understand that online safety is considerable and ever evolving, but categorise into four areas of risk which inform our online safety policy:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. We use approaches from [Educate Against Hate](#) to tackle this important area.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, 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)
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Woodland Middle School have a clear policy on the use of mobile and smart technology, and how this is managed on site.

15. Alternative Provision

Woodland Middle School utilise alternative provision providers for children where required, and we understand that we maintain the responsibility for the safeguarding of that child. We will ensure the placement meets the child's needs. We will ensure we obtain written confirmation of the following:

- Information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff).
- Written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.
- Where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.

Woodland Middle School will regularly (at least half termly) review the alternative provision placements they make, to gain assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary.

School/setting has due regard to the following statutory guidance:

- [Arranging Alternative Provision](#) (February 2025)
- [Arranging education for children who cannot attend school because of health needs](#) (December 2023)

16. Safeguarding in specific circumstances: Children/Young People who are vulnerable to extremism

- Woodland Middle School seeks to protect children/ young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Extreme Right Wing / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- In accordance with the Prevent Duty placed upon the school by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism. Woodland Middle School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- Woodland Middle School values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children/young people and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to this school are the fundamental British Values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and

the rights of all women and men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.

- Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Six.

Risk reduction.

- The school governors, the Head Teacher/Principal and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of children/young people by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.
- In addition, the school Prevent Action Plan template may be used to demonstrate how the organisation is fulfilling the prevent duty. Please see Appendix Twelve.
- Woodland Middle School have due regard for [Terrorism \(Protection of Premises\) Act 2025](#) (otherwise known as 'Martyn's Law'), and refer to the following guidance: [Overarching Factsheet - GOV.UK](#). The Act received Royal Assent on 3 April 2025, and it is expected that the implementation period will be at least 24 months.
- In accordance with the Prevent Duty, Sergio Matias is the Single Point of Contact (SPoC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.
- When any member of staff has concerns that a child/young person may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the DSL, if this is not the same person. Concerns must be recorded on the school's safeguarding referral form/system.
- If a child/young person is thought to be at risk of radicalisation, a referral will be made using the National Prevent Referral Form which shall be sent directly to the Police.
- Initial advice regarding Prevent related concerns or whether to submit a referral will be sought from Bedfordshire Police by emailing Prevent@beds.police.uk.
- In all cases, in accordance with advice provided from Bedfordshire Police, the school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children/young people assessed as being vulnerable to radicalisation.
- If the school are concerned that a child/young person may be at risk of significant harm in relation to radicalisation or involvement in violent extremism, a child protection referral will be made to Children's Social Care.

17. Safeguarding Children/Young People in Specific Circumstances: Female Genital Mutilation (FGM) / Forced Marriage / Modern Day Slavery

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female

circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

- FGM is illegal in the UK and it is also illegal to take a British national or permanent resident abroad for FGM or help someone trying to do this.
- Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **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. This is in addition to following the school's safeguarding reporting procedures. A teacher means any person within the Education Act 2002 (section 141A (1)) employed or engaged to carry out teaching work at schools or other institutions.
- Those failing to report such cases will face disciplinary sanctions.
- If the school are concerned that a child/young person has experienced or is at risk of FGM, a Child Protection referral will be made to the Access and Referral HUB in accordance with interagency procedures produced by the CBSCP. In addition, all teachers will follow mandatory reporting duties. Please refer to [One Minute Guide FGM](#) (Further information regarding FGM can be found in Appendix Seven)
- A [Forced Marriage](#) is where one or both people do not (or in cases of people with learning disabilities), cannot consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.
- The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.
- The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry - this includes:
 - taking someone overseas to force them to marry (whether or not the forced marriage takes place)
 - marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
 - breaching a Forced Marriage Protection Order.
- Further multi-agency statutory guidance for dealing with forced marriage can be found here [The right to choose: government guidance on forced marriage.](#)
- Modern Day Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol). Modern Day Slavery crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
- Although human trafficking often involves an international cross-border element, it is also possible to be a victim of Modern-Day Slavery within your own country.

Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- sexual exploitation
- forced labour
- domestic servitude
- organ harvesting
- child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- forced marriage and illegal adoption (if other constituent elements are present).

18. Safeguarding Children/Young People in Specific Circumstances: Child on Child abuse

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children/young people outside of these environments.

All staff, but especially the DSL (and Deputies) should consider whether children/young people are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children/young people can be vulnerable to multiple harms including, but not limited to, sexual abuse, including harassment and exploitation, domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

- **Woodland Middle School** recognises that children/young people can abuse each other, and such behaviours are never viewed simply as 'banter' or as part of growing up. We recognise that child on child abuse can take many different forms such as:
 - cyber-bullying
 - sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as youth Produced Sexual Imagery)
 - sexual assault
 - sexual violence or harassment
 - upskirting
 - sexually harmful or problematic behaviour
 - gang initiation or hazing type violence
 - harassing messages and misogynistic messages
 - the non-consensual sharing of indecent images
 - the sharing of abusive images and pornography, to those who do not want to receive such content
 - the exploitation of others, linked youth produced images.
- Upskirting is an illegal offence which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Woodland Middle School recognises serious violence and signals that children/young people are at risk from or are involved in serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing or signs of

assaulted/unexplained injuries. Unexplained gifts or new possessions could indicate that children/young people have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

- [Contextual safeguarding](#)/extra familial risk as referenced in KCSIE (2025) highlights that *'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. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process'*.
- Contextual safeguarding can also be known as *'risk outside the home'* (Working Together, 2023)
- Woodland Middle School has a thorough understanding of contextual safeguarding and will make a referral in the first instance if apparent.

Woodland Middle School has adopted a Child-on-child Abuse Policy which outlines the actions school will take in responding to reports of Child-on-child abuse.

- Woodland Middle School manage the use of mobile and smart technology on the premises and reflect this in the behaviour / child protection policy.
- We carry out an annual review of our approach to online safety, filtering and monitoring supported by an annual risk assessment that considers the risks to children/young people.

19. Safeguarding Children/Young People in Specific Circumstances: Sexualised behaviours

- Where children/young people display sexualised behaviours, the behaviours will be considered in accordance with the children/young person's developmental understanding, age and impact on the alleged victim. Tools such as Brook Traffic Light Tool may be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child(ren)/young people receive the right support at the right time either via an Early Help response or referral to Children's Social Care.
- Woodland Middle School follow [Keeping children safe in education 2025](#) when responding to such issues alongside local interagency procedures. This includes responding to any reports in a child-centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children/young people.
- The Lucy Faithfull Foundation has developed a [HSB Toolkit](#), which amongst other things, provides support, advice and information on how to prevent Harmful Sexual Behaviour, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- We will seek specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.
- All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a

problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

- In all cases of child on child abuse the school will consider the vulnerability of all children/young person including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response. Consideration will be given to violence in young people's relationships.
- Where necessary, the school's Behaviour and Child on Child Abuse policy will be invoked, and any sanctions applied will be consistent with these procedures.
- Where issues indicate that a criminal offence may have been committed, a report will be made to Bedfordshire Police.

20. Safeguarding Children/Young People in Specific Circumstances: Gang related violence (Contextual/Extra Familial Risk)

- Woodland Middle School recognises the risks posed to children/young people in relation to involvement in gang related activity, which may be street gangs, peer group or organised crime. Children/young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children/young people may experience violence as part of an initiation or hazing practice.
- The school understands that Early Help can be crucial in the early identification of children/young people who may need additional support due to gang related activity and as such will provide an Early Help response, including referral when concerns are raised about indicators of gang activity.
- If, however, information suggests a child/young person may be at risk of significant harm due to gang related activity, a referral will be made to Children's Social Care.
- Where there are concerns that a child/young person may be, or is at risk of, becoming involved in gang related activity, a referral will be made to the Serious Youth Violence Panel in accordance with local procedures as part of the safeguarding response.
- Woodland Middle School understand the process of completing a multi-agency information sharing form which highlights broader concerns contextually occurring outside of the child/young person's home.
- See Appendix Nine for further information on risk indicators for gang involvement.

21. Safeguarding Children/Young People in Specific Circumstances: Youth Generated Sexualised Imagery

- Woodland Middle School recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the [UK Council for Child Internet Safety](#) in relation to how we respond to incidents. [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\)](#)

- In all cases where an incident of youth produced sexual imagery is reported, the following actions will be undertaken:
 - the incident should be reported to the DSL as soon as possible.
 - the DSL should hold an initial review discussion or meeting with appropriate school staff.
 - there should be subsequent interviews with the child(ren)/young people involved (if appropriate).
 - parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child/young person at risk of harm.
 - at any point in the process if there is a concern a child/young person has been harmed or is at risk of harm a referral should be made to Children’s Social Care and/or Bedfordshire Police immediately.
- An immediate referral will be made to Bedfordshire Police and Children’s Social Care in the following circumstances:
 - the incident involves an adult.
 - there is reason to believe that a child/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)
 - the imagery suggests the content depicts sexual acts which are unusual for the child/young person’s developmental stage or are violent.
 - the imagery involves sexual acts and any pupil in the imagery is under 13.
 - there is reason to believe a child/young person is at immediate risk of harm owing to the sharing of the imagery, for example, the child/young person is presenting as suicidal or self-harming.
- If none of the above applies, the school may choose to deal with the incident without involving Bedfordshire Police or Children’s Social Care. This will usually be the case where the DSL is confident that they have enough information to assess the risks to the pupils involved and the risks can be managed within the school pastoral support and disciplinary framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren/young person.
- The school will pay due regard to the [Department for Education guidance: Searching, Screening and Confiscation advice.](#)
- Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the DSL will respond to an incident based on what they have been told about the imagery.
- All incidents will be recorded.

More information is available in Appendix Eight.

22. Safeguarding Children/Young People in specific circumstances: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity. Whilst age may be most obvious factor, 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. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. This abuse can be perpetrated by individuals or groups, males or females and children/young people 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. It can involve force and/or enticement-based methods of compliance and maybe accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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/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 through the use of technology.

All staff will be aware that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

The school will have procedures in place in managing poor school attendance and this will need to be regularly reviewed.

Child sexual exploitation can occur through use of technology without the child/young person's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child/young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

- The school recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators.
- The school recognises that there are various 'models' of CSE which include but not limited to:
 - gangs and groups
 - boyfriend/girlfriend model

- child on child
- familial
- online
- abuse of authority
- Where concerns are identified in relation to Child Sexual Exploitation the [Threshold Document](#) will be consulted in order to ensure the child/young person receives support at the earliest possible opportunity.
- An Early Help multi-agency response may be initiated from the school as the lead practitioner by completing an Early Help Assessment or completing an Early Help referral through the Access and Referral HUB.
- If a child/young person is thought to be at risk of significant harm through child sexual exploitation a referral will be made to Children's Social Care.
- Advice will be sought to establish if a [National Referral Mechanism](#) is appropriate.
- In all cases, intelligence/information will be shared with Bedfordshire Police using the Multi-Agency Information Sharing Form.
- [Resources for education settings | CSA Centre](#) will be utilised to strengthen our approach to Child Sexual Abuse.

23. Children in specific circumstances: further guidance

Further guidance in relation to safeguarding children/young people in specific circumstances can be found on the Bedford Borough, Central Bedfordshire and Luton Safeguarding Children Partnership Procedures ([Contents](#))

24. Mental Health

- All staff are aware that mental health problems can, in some cases, be an indicator that a child/young person has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained practitioners should attempt to make diagnosis of a mental health problem. However, staff will observe children/young people 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.
- Where children/young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences, can impact on children/young people's mental health, behaviour and education.
- If staff have a mental health concern about a child/young person that is also a safeguarding concern, immediate action will be taken following the child protection policy including discussion with the DSL or Deputy. The DSL will liaise with the Senior Mental Health Lead, or Mental Health Support Team, where the safeguarding concern is linked to mental health.

- The school will access a range of advice to help them identify children/young people in need of extra mental health support. This includes working with external agencies as described in [Promoting and Supporting mental health and wellbeing in schools and colleges](#)

25. Homelessness

- Woodland Middle School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child/young person's welfare.
- The DSL (and any Deputies) are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- Woodland Middle School recognises that whilst in most cases school and college staff will be considering homelessness in the context of children/young people who live with their families, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Social Care will be the lead agency for these young people and the DSL (or a Deputy) should ensure appropriate referrals are made based on their circumstances.
- Staff are aware of the indicators that a family may be at risk of homelessness, to include: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.
- Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate but will not replace a referral into Children's Social Care where a child/young person has been harmed or is at risk of harm.
- The Local Authority has a legal duty to address concerns under the Homelessness Reduction Act 2017. The focus is early intervention and to encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

26. Domestic Abuse

- All staff are aware of The Domestic Abuse Act 2021 which introduced the first statutory definition of domestic abuse and recognises that children/young people can be victims of domestic abuse; they may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (as below). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- Staff will continue to develop their understanding of domestic abuse, and how all children/young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.
- Staff are aware exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children/young people. In some cases, a child/young person may blame themselves for the abuse or may have had to leave the family home as a result.

- Woodland Middle School recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse.
- Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.
- Types of domestic abuse include intimate partner violence, abuse by ex-partners, family members, teenage relationship abuse and adolescent to parent violence.
- Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child/young person under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.
- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

27. 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'- attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
- making, supplying or obtaining malware such as viruses, with the intent to commit further offences.
- Children/young people 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/young person in this area, the DSL (or Deputy), should consider referring into the **Cyber Choices** programme.
- Cyber Choices is a nationwide police programme supported by the Home Office and led by the National Crime Agency which aims to intervene where children/young people are at risk of committing, or being drawn into, low level cyber-dependent offences.

- Additional advice can be found at: [Cyber Choices](#)

28. Children with additional needs

- Woodland Middle School recognises that while all children/young people have a right to be safe, some children/young people may be more vulnerable to abuse, for example a young carer, a child/young person frequently missing from home/care, children/young people with disabilities or special educational needs, a child/young person living with domestic abuse, parental mental ill health or substance abuse, or a child/young person who has returned home to their family from care.
- We recognise that additional barriers can exist when recognising abuse and neglect in children/young people with special educational needs or disabilities, medical or physical health conditions.
- These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's condition without further exploration;
 - these children/young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children/young people;
 - the potential for children/young people with SEND or certain medical conditions being disproportionately impacted by behaviours such as 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.
- Any reports of abuse involving children/young people with SEND will therefore require close liaison with the DSL (or Deputy) and the SENCO or the named person with oversight for SEND.
- Woodland Middle School will consider extra pastoral support and attention for these children/young people, along with ensuring any appropriate support for communication is in place.
- If Woodland Middle School is considering excluding, either fixed term or permanently, a vulnerable child/young person and/or a child/young person who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.
- Where a parent/carer has expressed their intention to remove a child/young person from school with a view to educating at home, we work together with Local Authority and other key practitioners to coordinate a meeting with parents/carers where possible. We will do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child/young person. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

- In the event of a one-off serious incident resulting in an immediate decision to exclude, a risk assessment *must* be completed prior to convening a meeting of the Governing Body.

29. Children/Young People who are lesbian, gay, bi or trans (LGBT), or gender questioning

- Woodland Middle School recognise that whilst the fact that a child/young person may be LGBT is not in itself an inherent risk factor for harm, children/young people who are LGBT can be targeted by other children/young people.
- A child/young person who is perceived by other children/young people to be LGBT (whether they are or not) can be just as vulnerable as those who identify as LGBT.
- Woodland Middle School will endeavour to reduce barriers faced by children/young people who are LGBT and will provide a safe space for them to speak out or share their concerns with members of staff. This safe space is '**Free to be me club**'.
- Further Government guidance is expected on gender questioning children, and once available, policies and procedures will be updated.

30. What we do when we are concerned about a child/young person.

- All concerns will be viewed alongside [Threshold Document](#) in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.
- The school also places due regard to the guidance contained in '[What to do if you are worried a child is being abused](#)', 2015.
- If, in consultation with the [Threshold Document](#), the level of concern sits at Level 2 then support will be provided by the school as the Lead Practitioner. If, in consultation with the Thresholds of Need Guide, the concern sits at a Level 3, a referral will be made into the Access and Referral HUB. Additional support or advice for this work may be sought from the Early Help Service as a multi-agency response.
- In cases where it is not possible to obtain consent from the parent/carer, the school will seek advice from the Integrated Front Door.
- The school will review each case to ensure that any support or intervention provided has impacted positively on the welfare/safety of the child/young person and that improvement is sustained.
- In the event that provision of support has not led to improvements for the child/young person, or concerns escalate, the school will follow the step-up [Escalation Procedures](#) published by the CBSCP.
- In consultation with the [Threshold Document](#), if the concerns about the child/young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Access and Referral HUB.
- The parent/carer will be informed of the referral unless informing the parent may place the child/young person at increased risk of harm.

- In the event of a professional disagreement in relation to a specific concern, the school will follow the [Escalation Procedures](#).

31. Involving parents/carers

In general, we will discuss any safeguarding and child protection concerns with parents / carers before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. However, there may be occasions when the school will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child/young person.

Parents / carers will be informed about the safeguarding policy through: our website <https://woodlandacademy.co.uk>

32. Multi-agency work

- The school understands its role in the Central Bedfordshire Safeguarding Children Partnership (CBSCP). Governing bodies, proprietors and the senior leadership teams, especially the DSLs, will make themselves aware of and follow their local arrangements.
- Woodland Middle School work in partnership with other agencies in the best interests of children/young people. The school will, where necessary, liaise with the school nurse, initiate an effective support response, and make referrals to Children's Social Care. Referrals and contacts should be made by the DSL or one of the Deputy Leads to Early Help/Children's Social Care. Where the child/young person already has a social worker, the request for a service will go immediately to the social worker involved, or in their absence to their team manager or duty social worker.
- We will co-operate with any child protection enquiries conducted by Children's Social Care. The school will ensure representation at appropriate inter-agency meetings such as Team Around the Family/Strategy meetings, Initial and Review Child Protection Conferences, together with core group meetings.
- We will provide reports as required for these meetings in accordance with the CBSCP interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.
- Where a child is subject to an Inter-agency Child Protection Plan, Child in Need Plan or TAF Support Plan, the school will contribute to the preparation, implementation and review of the plan as appropriate.
- If a child is subject to a referral to a multi- panel such as [Multi Agency Risk Assessment Conference \(MARAC\)](#) or [CHANNEL Panel](#), the school will contribute to such arrangements.

33. Responding to an allegation or concern about a member of staff

- The school will comply with the CBSCP procedures for [Allegations and Concerns regarding Staff, Carers and...](#) in all circumstances.
- These procedures should be used in any case in which it is alleged that a member of staff (**including supply staff**), governor, visiting professional or volunteer has:
 - behaved in a way that has harmed or may have harmed a child/young person.
 - possibly committed a criminal offence against or related to a child/young person; or
 - behaved in a way that indicates s/he may pose a risk of harm to children/young person.
 - behaved in a way that indicates they may not be suitable to work with children/young person.
- We will consult with the LADO when an allegation is made against a member of staff to agree how to progress this.
- Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children/young people.
- All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children/young people **immediately**.
- Allegations or concerns about colleagues and visitors must be reported directly to the Head Teacher/Principal unless the concern relates to Head Teacher/Principal. If the concern relates to the Head Teacher/Principal, it must be reported immediately to the Chair of Governors. Alternatively, concerns can be reported directly to the Local Authority Designated Officer (LADO) in Children's Social Care, who will liaise with the Chair of Governors, and they will decide on any action required.
- Schools should follow their safeguarding policies and procedure in the event of an allegation regarding an "incident that happened when an individual or an organisation was using their school premises for the purposes of running activities for children/young people." This includes events such as community groups, sports associations, and more.
- If the Head Teacher/Principal is not available, the member of staff should report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns.
- Contact with the LADO should happen at the earliest possible opportunity and within 1 working day.

The LADO in Central Bedfordshire can be contacted at LADO@centralbedfordshire.gov.uk

- The LADO may request a referral - if this is requested, the referral will be completed and submitted within 1 working day.

- The school will engage with the LADO at all stages of the management of the allegation/concern and comply with the statutory guidance contained within [Keeping children safe in education 2025](#) and the local procedures published by [Safeguarding Children | Central Bedfordshire Council](#).
- In this regard, the school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered.
- Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.
- Should the school dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with statutory duty, a referral to the Disclosure and Barring Service will be made.
- If the member of staff is engaged in teaching work, the school will, in accordance with published guidance from the Department for Education, consider whether a referral to the Teaching Regulation Agency (TRA) should be made.
- The school will adhere to the statutory guidance contained within [Keeping children safe in education 2025](#) with regard to record keeping, references and compromise or settlement agreements.
- If an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per the school's behaviour policy.
- The school has appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children/young people.
- If a member of staff, student or volunteer has any concerns about poor, unsafe practice, or failures of the safeguarding regime, they are encouraged to raise this with the Head Teacher/Principal, Senior Leadership Team or Governing Body, following the Whistle Blowing Procedures of the school.
- The [NSPCC whistleblowing helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. 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.

APPENDICES

Appendix One

The Designated Safeguarding Lead will:

- support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff
- refer cases to the Police where a crime may have been committed.
- inform Head Teacher/ Principal of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – [PACE Code C 2019](#)
- seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required.
- liaise with the Designated Senior Manager for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files.
- ensure safeguarding and child protection information will be dealt with in a confidential manner and in accordance [Safeguarding Children | Central Bedfordshire Council](#)
- ensure staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child/young person and/or family.
- ensure a written record will be made of what information has been shared with whom, and when.
- ensure that child protection files are kept up to date.
- ensure rationale for making decisions is recorded (inc. decision not to make a referral)
- ensure safeguarding and child protection records will be stored securely in a central place separate from academic records.
- ensure individual files will be kept for each child/young person: the school will not keep family files.

- ensure access to safeguarding and child protection records by staff other than by the DSL will be restricted, and a written record kept of who has had access to them and when
- ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.
- ensure general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.

Appendix Two

Roles and responsibilities of the Governing Board

The governing body/equivalent will ensure that:

- the school contribute to inter-agency working in line with statutory guidance [‘Working Together to Safeguard Children 2023’](#) - 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
- the school provides an appropriate safeguarding response in order to safeguard children/young people.
- online safety is a running and interrelated theme whilst devising and implementing the whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety, filtering and monitoring whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL (and Deputies) and any parental engagement.
- the school pays due regard to the need to safeguard children in specific circumstances such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or child on child abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment, upskirting or youth produced sexual imagery.
- the child protection policy reflects and addresses additional challenges exist for those children/young people with special educational needs and disabilities and physical and mental health needs, and the school should consider extra pastoral support and attention for these children/young people, along with ensuring any appropriate support for communication is in place.
- the school maintains information about the legal status of all children/young people including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child/young person.

- there is a designated teacher with the appropriate training skills and knowledge appointed to work with the virtual school head to promote the academic achievement of looked after children and children previously looked after.
- the school's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter- procedures, set up by the CBSCP. This includes working with Children's Social Care from other areas when children attend school in Central Bedfordshire however live outside of Central Bedfordshire.
- the school shares information with other practitioners in the interests of safeguarding children/young people in accordance with the guidance within [Working Together to Safeguard Children 2023](#) and [Information Sharing, 2024](#)
- they recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that clearly set out the processes and principles for sharing information within the school and with Children's Social Care, the safeguarding partners, other organisations, agencies, and practitioners as required.
- that School staff be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority Children's Social Care.
- they are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- relevant staff have due regard to the relevant data protection principles.
- the school initiates appropriate safeguarding responses to children/young people who are missing or have unexplainable and/or persistent absences from education, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of their going missing in future.
- the Head Teacher/Principal ensures that safeguarding policies and procedures which have been adopted by the Governing Body are consistently implemented.
- the school has a staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - staff/child relationships and communications including the use of social media and other online platforms, low level concerns.
- the school has procedures for managing **any** allegations and concerns about adults that work or volunteer with children/young people, that **may** or **may not** meet the harm threshold and that these include the procedures for making referrals to the Disclosure and Barring Service and Teacher Regulation Agency where appropriate.
- the school operates, "safer recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with [Keeping children safe in education 2025](#).

- the DSL is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated - this is clearly defined within the role holder's job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role as per Appendix C Keeping Children Safe in Education 2025.
- the DSL maintains management oversight of any work undertaken by the Deputy DSL.
- any Deputy DSL has the appropriate training skills and knowledge to undertake the operational function of the DSL as per appendix C of Keeping Children Safe in Education 2025.
- the DSL and any Deputies undertake [Pan Bedfordshire Safeguarding Children Partnership's higher level training](#) to ensure they have the appropriate training, skills and knowledge to carry out this role.
- in addition, the DSL and any Deputies will update their knowledge by receiving safeguarding updates via the DSL forums, cluster meetings, attendance at training and learning events offered by the CBSCP, online updates via NSPCC or attendance at professional development events.
- the Head Teacher/Principal and all other staff who work with children undertake safeguarding training in accordance with [Keeping children safe in education 2025](#) and that they receive annual safeguarding updates to ensure their continued professional development
- all Governors and Trustees receive appropriate safeguarding and child protection (including online and filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly annually.
- training updates take account of the CBCSCP priorities, the local context, the needs of the pupils and other identified training needs.
- all training will incorporate safeguarding children in specific circumstances which includes but is not limited to: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child on child abuse.
- the training will ensure that child on child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence - the training recognises how alcohol use, drug use, truancing and youth generated sexualised imagery increases risks of harm to children/young people. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children.
- the school has appropriate safeguarding responses for children/young people who go missing from education which should include holding more than one emergency contact number for pupils.

- the school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.
- temporary staff and volunteers are made aware of the school's procedures for child protection and their responsibilities.
- the school remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the DSL and Deputies in shaping safeguarding arrangements.
- the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.
- the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Governing bodies should consider the age range and number of their children/young people, how often they access the IT system and the proportionality of costs verses safeguarding risks. Over blocking of material which could restrict children/young people's online learning will be avoided.
- the curriculum is delivered in such a way to include educating children/young people about how to stay safe which will include Relationship and Sex Education (RSE), online safety and broader safeguarding messages within PSHE.
- Children/young people 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/young people, including those who are victims of abuse, and with special educational needs or disabilities.
- the child/young person's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children/young people to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- the governing body reviews the policies/procedures annually.
- a member of the governing body, usually the chair, is nominated to liaise with the Designated Officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Head Teacher, the principal of a college or proprietor or member of governing body of an independent school.

Appendix Three

Definitions and indicators of abuse

Abuse

Abuse is a form of maltreatment of a child/young person. Somebody may abuse or neglect a child/young person by inflicting harm or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children/young people of all forms of domestic abuse.

Children/young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Children/young people may be abused by an adult or adults or by another child(ren)/young person.

Neglect

Neglect is the persistent failure to meet a child/young person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result 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/young person from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school; or
- the child is left at home alone or with inappropriate carer.

Physical abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches

- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents being contacted
- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers.

Sexual abuse

Sexual abuse involves forcing or enticing a child/young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/young person 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. They may also include non-contact activities, such as involving children/young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children/young people to behave in sexually inappropriate ways, or grooming them in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit act of sexual abuse, as can other children/young people.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention seeking behaviour, self-mutilation, substance abuse
- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately

- depression, withdrawal, isolation from peer group
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area.

Sexual exploitation

Child sexual exploitation occurs when a child/young person, or another person, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Children's Social Care. The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adult
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the Internet and mobile technology; and
- having unexplained contact with hotels, taxi companies or fast-food outlets.

The Multi-Agency Information Submission Form will be used to share information with Bedfordshire Police that raises a concern around CSE and other forms of exploitation, etc.

[Preventing Child Sexual Exploitation | The Children's Society](#) is utilised by the school to support our approach to this area.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to children/young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child/young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children/young people. These may include interactions that are beyond the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- the child/young person consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly
- over-reaction to mistakes
- delayed physical, mental or emotional development
- sudden speech or sensory disorders
- inappropriate emotional responses, fantasies
- behaviours such as rocking, banging head, regression, tics and twitches
- self-harming, drug or solvent abuse
- fear of parents being contacted
- running away
- compulsive stealing
- appetite disorders - anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis.

N.B: Some situations where children/young people stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

Responses from parents

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- incompatible explanations offered, several different explanations or the child/young person is said to have acted in a way that is inappropriate to their age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude towards the child/young person
- unrealistic expectations or constant complaints about the child/young person
- alcohol misuse or other drug/substance misuse
- parents request removal of the child/young person from home; or
- violence between adults in the household.

Disabled children/young people

When working with children/young people with disabilities, practitioners need to be aware those additional vulnerabilities to abuse and neglect such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's disability without further exploration
- being more prone to peer group isolation or bullying than other children
- Children/young people with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

Possible indicators of abuse and/or neglect may also include:

- a bruise in a site that might not be of concern on an ambulant child/young person such as the shin, might be of concern on a non-mobile child/young person
- not getting enough help with feeding leading to malnourishment
- poor toileting
- lack of stimulation
- unjustified and/or excessive use of restraint
- rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- unwillingness to try to learn a child/young person's means of communication
- ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting
- misappropriation of a child/young person's finances; or
- inappropriate invasive procedures.

Appendix Four

Dealing with a disclosure of abuse

When a child/young person tells me about abuse they have suffered, what must I remember?

- stay calm
- do not communicate shock, anger or embarrassment
- reassure the child/young person
- tell them you are pleased that they have spoken to you
- never enter into a pact of secrecy with the child/young person
- assure them that you will try to help but let them know that you will have to tell other people in order to do this (state who this will be and why)
- tell them that you believe them
- children/young people very rarely lie about abuse; but they may have tried to tell others and not been heard or believed
- tell the child/young person that it is not their fault
- encourage the child/young person to talk but do not ask "leading questions" or press for information
- listen and remember
- check that you have understood correctly what the child/young person is trying to tell you
- praise the child/young person for telling you
- communicate that they have a right to be safe and protected
- do not tell the child/young person that what they have experienced is dirty, naughty or bad
- it is inappropriate to make any comments about the alleged offender

- be aware that the child/young person may retract what they have told you. It is essential to record all you have heard
- at the end of the conversation, tell the child/young person again who you are going to tell and why that person/people need to know
- as soon as you can afterwards, make a detailed record of the conversation using the child/young person's own language – include any questions you may have asked
- Do not add any opinions or interpretations.

NB. It is not education staff's role to seek disclosures; their role is to observe that something may be wrong, ask about it, listen, be available and make time to talk.

The child/young person may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child/young person. It is important that staff determine how best to build trusted relationships with children/young people which facilitate communication.

Immediately afterwards

You must not deal with this yourself. Clear indications or a disclosure of abuse must be reported to Children's Social Care without delay, by the Head Teacher/Principal or the DSL.

Children/young people making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL or Head Teacher/Principal.

Appendix Five

Allegations and concerns about a member of staff, governor or volunteer

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**

For example: the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.

- **Emotional**

For example: intimidation; belittling; scapegoating; sarcasm; lack of respect for children/young people's rights; excessive and/or aggressive shouting; and attitudes that discriminate on the grounds of race, gender, disability or sexuality.

- **Sexual**

For example: sexualised behaviour towards peers; sexual harassment; sexual communication including via social networking, email, text; grooming behavior; and sexual assault and rape.

- **Neglect**

For example: failing to act to protect a child(ren)/young people, failing to seek medical attention or failure to meet a child/young person's basic needs.

- **Behaviours which may pose a risk**

Some behaviours which may take place outside of the workplace could present a transferable risk in an employee's professional role working with or in the vicinity of children/young people. For example, alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in children/young people, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children/young people.

If a child/young person makes an allegation or raises a concern about a member of staff (including supply staff), governor, visitor or volunteer the Head Teacher/Principal should be

informed immediately. If the allegation or concern falls within the following criteria, the LADO will be contacted at the earliest possible opportunity and within 1 working day:

- behaved in a way that has harmed or may have harmed a child/young person;
- possibly committed a criminal offence against or related to a child/young person;
- behaved in a way that indicates they may pose a risk of harm to children/young people.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people.

The Head Teacher/Principal will not carry out the investigation him/herself or interview pupils.

If a child/young person makes an allegation of physical abuse against an adult that works with children/young people and there are visible bruises, marks or injuries, or if a child/young person makes an allegation of sexual abuse against an adult that works with children/young people, child protection procedures will be followed and a referral made to Children's Social Care. The LADO will also be informed.

The Head Teacher/Principal must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –

- If the actions of the member of staff are felt likely to fall within the scope of the Interagency Allegation Management Procedures (as stated in point 2), the Head Teacher/Principal will notify the Local Authority Designated Officer. The LADO will liaise with the Head Teacher/Principal and advise about actions to be taken which will be in accordance with the Interagency Allegation Management Procedures.
- If the Head Teacher/Principal is uncertain, whether the concern or allegation falls within the scope of the Interagency Allegation Management Procedures, a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.
- Where an allegation has been made against the Head Teacher/Principal, then the Chair of the Governing Body takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the section [on Allegations against Staff and Volunteers](#).

Concerns that do not meet the harm threshold.

Our Governing body have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold.

We recognise that concerns may arise in several ways and from a number of sources, for example:

- suspicion;
- complaint;

- disclosure made by a child, parent or other adult within or outside of the organisation;
- as a result of vetting checks undertaken.

Woodland Middle School understand that the term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the threshold set out (as per KCSIE 2025, paragraph 430)

A low-level concern is any concern 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.

Woodland Middle School have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children/young people (see-low level concerns appendix fifteen).

We understand that creating 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.

As good practice our Governing bodies will:

- set out their low-level concerns policy within their staff code of conduct and safeguarding policies
 - ensure procedures are implemented effectively
 - ensure their 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
 - empower staff to share any low-level safeguarding concerns with the DSL (or a Deputy)
 - address unprofessional behaviour and support the individual to correct it at an early stage
 - provide a responsive, sensitive and proportionate handling of such concerns when they are raised,
 - help identify any weakness in the school safeguarding system.
- If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school's low-level concerns policy (see appendix fifteen).
 - Low-level concerns about a member of staff will be reported to the DSL or Head Teacher / Principal.
 - Where a low-level concern is raised about the DSL, it will be shared with the Head Teacher or Principal.
 - Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern will be shared with the DSL (or Deputy), and/or Head Teacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

- All low-level concerns will be recorded in writing on CPOMS. The record will include:
 - details of the concern,
 - the context in which the concern arose,
 - action taken,
 - the name of the individual sharing their concerns will also be noted, however if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.
- The Head Teacher / Principal will be the ultimate decision maker in respect of all low-level concerns and may consult with the DSL to take a more collaborative decision-making approach.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Where a pattern of such behaviour is identified, the Woodland Middle School 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, be referred to the LADO.
- Low level concerns would not be included in references unless they relate to issues which would normally be included in a reference, for example, 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 would be referred to in a reference.

Appendix Six

Indicators of vulnerability to radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as (KCSiE 2025, page 157):
Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
3. Extremism is defined by the Crown Prosecution Service as:
'The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - seek to provoke others to terrorist acts
 - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - foster hatred which might lead to inter-community violence in the UK.'
4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Children/young people may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:

- identity crisis – the child/young person is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- personal crisis – the child/young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- personal circumstances – migration; local community tensions; and events affecting the child/young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- unmet aspirations – the child/young person may have perceptions of injustice; a feeling of failure; rejection of civic life
- experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
- special educational need – children/young people may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all children/young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Appendix Seven

Safeguarding in Specific Circumstances: Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse. It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sexual intercourse, childbirth and mental health.

Effects of FGM

There are no health benefits to FGM, and it can cause serious harm, including:

- constant pain
- pain and/or difficulty having sex
- repeated infections, which can lead to infertility
- bleeding, cysts and abscesses
- problems passing urine or incontinence
- depression, flashbacks and self-harm
- problems during labour and childbirth, which can be life-threatening for mother and baby.

Some girls die from blood loss or infection as a direct result of the procedure.

Why FGM is carried out.

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way (for example, as a preparation for marriage or to preserve her virginity).

However, there are no acceptable reasons that justify FGM. It's a harmful practice that isn't required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM.

FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it's carried out.

Where FGM is carried out

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays, as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM happening to them.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan	Oman
Ethiopia	Somalia	Gambia	Sierra Leone	Mali
Guinea	Nigeria	Indonesia	Saudi Arabia	Ivory Coast
Malaysia	Kenya	Iraqi Kurdistan	Liberia	

The law and FGM

FGM is illegal in the UK. It is a criminal offence to:

- perform FGM (including taking a child abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM.

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

The Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) 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.

Possible signs and indicators of FGM

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help but may not be explicit about the problem due to embarrassment or fear.

Below are some warning signs that MAY indicate a girl is at risk of FGM:

- parents requesting additional periods of leave around school holiday times
- if the girl comes from a country with a high prevalence of FGM
- mother and siblings have undergone FGM
- child may indicate that they are going for a special event (in the UK or abroad).

Further information can be obtained from:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Guidance on [FGM factsheet](#)

Appendix Eight

Safeguarding in specific circumstances: [Youth produced sexual imagery](#)

Definition: *This advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.*

Incidents covered by this policy:

- person under 18 creates a sexual image of themselves and shares it with another person under 18
- a person under 18 shares an image of another under 18 with another person under 18 or an adult
- a person under 18 is in possession of sexual imagery created by another person under 18

Incidents not covered by this guidance:

- under 18s sharing adult pornography
- under 18s sharing sexual texts without sexual imagery
- adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

The Law

Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The term 'indecent images' also include pseudo-images which are computer-generated images that otherwise appear to be a photograph or video. These may be created using tools such as photo/video editing software, deepfake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators.

These laws were not created to criminalise children/young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe children/young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the police may need to be involved in cases to ensure thorough investigation including collection of evidence. If a child/young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a child/young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or Children's Social Care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to police and/or Children's Social Care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the child/young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?

- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the child/young people involved have additional vulnerabilities?
- Does the child/young person understand consent?
- Has the child/young person taken part in this kind of activity before?

Informing parents/carers

Parents/carers should be informed and involved in the process at an early stage unless informing will put the child/young person at risk of harm. Any decision not to inform the parents/carers would generally be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when the parents/carers should be informed. DSLs may work with the child/young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the child/young person to inform their parents/carers themselves.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the child(ren)/young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child/young person or parent/carer in making a report
- is unavoidable because a child/young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery, then the DSL should:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Head Teacher/Principal
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Head Teacher/Principal
- ensure viewing takes place with another member of staff present in the room, ideally the Head Teacher/Principal or a member of the senior leadership team (this staff member does not need to view the images)
- wherever possible, ensure viewing takes place on school or college premises, ideally in the Head Teacher/Principal or a member of the senior leadership team's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for the school are followed.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Head Teacher/Principal can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the [DfE Searching, Screening and Confiscation advice](#) (note this advice is for schools only)

Appendix Nine

Safeguarding in Specific Circumstances: Gang involvement

There are particular risk factors and triggers that children/young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- becoming withdrawn from family
- sudden loss of interest in school - decline in attendance or academic achievement
- starting to use new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- sudden change in appearance - dressing in a particular style or 'uniform'
- dropping out of positive activities
- new nickname
- unexplained physical injuries
- graffiti style tags on possessions, school books, walls
- constantly talking about another child/young person who seems to have a lot of influence over them
- broken off with old friends and hanging around with a new group
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs

- expressing aggressive or intimidating views towards other groups of children/young people some of whom may have been friends in the past
- being scared when entering certain areas
- being concerned by the presence of unknown youths in their neighbourhood

This is not an exhaustive list and should be used as a guide.

Appendix Ten

Safeguarding in Specific circumstances: Child Sexual Exploitation

Child sexual exploitation takes different forms - from a seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. There is increasing concern about the role of technology in sexual abuse, including social networking, internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the 'relationship'. The perpetrator always has power over the child/young person, increasing the dependence of them as the exploitative relationship develops.

Many children/young people are groomed into sexually exploitative relationships, but other forms of entry exist. Some children/young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some children/young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

The school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

The key indicators of child sexual exploitation include:

Health-

- physical symptoms (bruising suggestive of either physical or sexual assault)
- chronic fatigue

- recurring or multiple sexually transmitted infections
- pregnancy and/or seeking an abortion
- evidence of drug, alcohol or other substance misuse
- sexually risky behaviour

Education-

- truancy/disengagement with education or considerable change in performance at school.

Emotional and Behavioural Issues-

- volatile behaviour exhibiting an extreme array of mood swings or use of abusive language
- involvement in petty crime such as shoplifting, stealing etc.
- secretive behaviour
- entering or leaving vehicles driven by unknown adults
- reports of being seen in places known to be used for sexual exploitation, including public toilets known for 'cottaging' or adult venues (pubs and clubs)

Identity-

- low self-image
- low self-esteem
- self-harming behaviour, e.g. cutting, overdosing
- eating disorders
- promiscuity

Relationships-

- hostility in relationships with staff, family members as appropriate and significant others
- physical aggression
- placement breakdown
- reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- detachment from age-appropriate activities
- associating with other young people who are known to be sexually exploited
- known to be sexually active
- sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- unexplained relationships with older adults
- possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet

- phone calls, text messages or letters from unknown adults
- adults or older youths loitering outside the home
- persistently missing, staying out overnight or returning late with no plausible explanation
- returning after having been missing, looking well cared for in spite of having no known home base
- missing for long periods, with no known home base
- going missing and being found in areas where they have no known links

Please note: Whilst the focus is often on older men as perpetrators, younger men and women may also be involved, and staff should be aware of this possibility.

Social Presentation-

- change in appearance
- going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people)

Family and Environmental Factors-

- history of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties

Housing -

- pattern of previous street homelessness;
- having keys to premises other than those known about

Income-

- possession of large amounts of money with no plausible explanation
- acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
- accounts of social activities with no plausible explanation of the source of necessary funding

This list is not exhaustive.

Appendix Eleven

Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children/young people's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children/young people and promotes their well-being.

This guidance does not deal with arrangements for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) **do not** prevent the sharing of information for the purposes of keeping children/young people safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or a Deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children/young people.'

Further guidance can be found at:

[Pan Bedfordshire Guide to Information Sharing](#)

[Information Sharing](#)

Prevent in Education Risk Assessment and Practice Action Plan

	YES	NO	Existing Controls	Further Action	Staff responsible	Due Date
Does your Safeguarding Policy make explicit that the school sees protection from radicalisation and extremist narratives as a safeguarding issue?						
Is the lead contact for Prevent responsibilities clearly identified in the policy? DSL/ Prevent Single Point of Contact SPOC Governor Safeguarding Lead						
Does SG policy make explicit how PREVENT concerns should be reported within school?						
Fundamental British Values are considered in curriculum planning						

Thinking about an incident of radicalisation and/or extremism - Has the setting considered specific potential areas of risk such as; Processes in place to manage Subject Access Requests/Freedom of Information Requests should they be made?						
The process in place for the management of information should there be media interest or if information requested into the community?						
How will information be shared and with whom?						
Does the school have clear guidance for visiting speakers? Checks for external speakers to the school. Has the identity of the speaker been confirmed, and due diligence carried out? (Might consider checks on the internet to confirm the status of speaker and/or the organisation to include website, YouTube or social media sites.) Checks for premises used by externals?						
Have ALL staff received appropriated training on PREVENT?						

Does this include support staff?						
Are there provisions for new staff induction?						
Have Governors received a PREVENT briefing?						
Do all staff know what to do if they have a PREVENT concern and to whom to report it?						
Does the E-Safety Policy refer to the requirements of the Prevent guidance?						
Appropriate filtering is in place to ensure that staff and children are unable to access unauthorised or extremist websites online through school systems.						
Protocols are in place to manage the layout, access and use of any space provided for the purposes of prayer, contemplation and faith facilities						
Clear guidance on governing the display of materials internally at the school						

Appendix Thirteen

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/young people.

Operation Encompass connects the police with schools to enable that the appropriate support is in place for children/young people who are subject to/witness incidents of domestic abuse. The school environment enabling rapid provision allows for appropriate safeguarding to be put in place against the short, medium and long-term effects of domestic abuse. Following an incident, children/young people may arrive at school distressed, anxious or upset and Operation Encompass ensures that appropriate staff are aware early enough in order to support children/young people in making them feel safe.

Please click [here](#) for more information.

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

Appendix Fourteen

Searching procedures

Schools will have due regard to [Searching, Screening and Confiscation guidance](#) as published by the DfE. The school may wish to explore a standalone policy around searching to safeguard children/young people and practice.

Woodland Middle School

Low-level Safeguarding Concerns Policy

Date policy last
reviewed: September
2025

Signed by:

_____	Headteacher	Date: _____
_____	Chair of governors	Date: _____

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Appendices

- A. [Low-level Concern Reporting Form](#)

Statement of intent

Woodland Middle School understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2025) 'Keeping children safe in education 2025'

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Inappropriate Relationships with Pupils Policy
- Staff Code of Conduct
- Physical Intervention Policy
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy
- Data Protection Policy

Definitions

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting.

Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the '[Appropriate and inappropriate behaviour](#)' subsection of this policy.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding

concerns often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

Roles and responsibilities

The governing board is responsible for:

- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The headteacher is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.

- Following all procedures outlined in this policy for acting upon low-level concerns.
- Liaising with the headteacher, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

Prevention amongst staff

Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the DSL, headteacher or other nominated person immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL include, but are not limited to:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on their personal mobile phones or devices.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All

staff will read, understand, and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct and the Inappropriate Relationships with Pupils Policy.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Evaluating school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The headteacher will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

Self-reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

Reporting Low-level Concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Low-level concerns will be shared with the Head in the first instance, the Deputy Headteachers or the DSL in the Head's absence.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the headteacher, it should be reported to the chair of governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the headteacher, who will, in turn, inform the employer of the subject of the concern.

Almost always, there will be a perfectly innocent explanation for what has occurred, and staff should not feel awkward about making a report or being the subject of a report. Reporting these types of concerns is a neutral act and the Headteacher will, on receiving a report, decide how to best approach the concern raised.

A member of staff who shares a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the Whistleblowing Policy.

Some of the circumstances in which staff must make a low-level concern report might be:

- any incident where they feel their actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation;
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- any adult being overfriendly with pupils, or encouraging the use of nicknames of staff or pupils;
- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (School medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons, etc;
- any incident where a staff member has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;

- any social contact with pupils outside of School (other than planned/authorised events, educational visits or trips, or insignificant incidents such as passing a pupil in the street or in a shop or noticing they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;
- if a pupil becomes aware of and/or uses a staff members home address, mobile or home phone number, or non-school e-mail address other than in line with agreed protocols;
- the fact of, and explanation for, any one-to-one contact with a pupil on School trips, particularly if this takes place in a private space such as a bedroom;
- non-trivial illnesses or accidents of pupils on School trips;
- any incident where, for whatever reason, a member of staff has not complied with the Staff Code of Conduct.

This is not an exhaustive list. Staff who are unsure are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made.

Evaluating concerns

Where the headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the headteacher will discuss the concern with the DSL and a deputy head, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the headteacher will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the headteacher and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be

reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.

- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

Acting on concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the headteacher will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The headteacher will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and headteacher will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level

Where the headteacher determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The headteacher holds a meeting with the individual about whom the concern was reported, during which they will:
 - Talk to the individual in a non-accusatory and sympathetic manner.

- Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
 - Clearly state what about their behaviour was inappropriate and problematic.
 - Discuss the reasons for the behaviour with the individual.
 - Inform the individual clearly what about their behaviour needs to change.
 - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
 - Allow the individual the opportunity to respond to the concern in their own words.
- The headteacher asks the individual to re-read the Staff Code of Conduct and/or the Inappropriate Relationships with Pupils Policy, depending on the nature of the concern.
 - The headteacher and the DSL will consider whether the individual should receive guidance, supervision or any further training.
 - Where considered appropriate in the circumstances, the headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
 - Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
 - Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Data Protection Policy. The headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Staff Code of Conduct Policy where behaviour does not improve once it is brought to their attention.

Where the concern is serious

The headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation.

Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The headteacher will ensure that all records include the most accurate and up-to-date information and will store them electronically in a low-level concerns file. The headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The headteacher will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The headteacher will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the headteacher will consult with the deputy headteachers and the DSL to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. It should be considered whether there are any wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The headteacher will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential and securely destroyed after the staff member to whom the concerns pertain has left the school.

When providing employment references, the school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated low-level safeguarding concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

The headteacher will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

Monitoring and review

This policy will be reviewed [annually](#) by the headteacher and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. The next scheduled review for this policy is [September 2026](#).

Woodland Middle School

Supervision Policy

Date policy last reviewed:

September 2025

Signed by:

Headteacher

Date:

Chair
governors

of

Date:

Last updated: September 2025

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Statement of intent

Woodland Middle School is committed to ensuring that all our staff members receive the best support possible to fulfil their roles and provide our pupils with a high-quality education. We also understand the importance of providing effective supervision of staff.

By implementing this policy, we hope to provide staff with opportunities to:

- Discuss any issues – particularly concerning pupil's development or wellbeing, including child protection concerns.
- Identify solutions to address issues as they arise.
- Receive coaching to improve their personal effectiveness.
- Make use of the support offered to help cope with the demands of protecting pupils.

Legal framework

This policy has due regard to all relevant legislation, including but not limited to, the following:

- Childcare Act 2006
- Education Act 2002
- Employment Rights Act 1996
- The Children Act 1989
- The Education (Health Standards) (England) Regulations 2003
- The Safeguarding Vulnerable Groups Act 2006
- The Education (Pupil Registration) (England) Regulations 2006 (as amended)
- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)

This policy also has due regard to the following statutory guidance:

- DfE (2017) 'Statutory framework for the early years foundation stage'
- DfE (2019) 'Reducing teacher workload'
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2025) 'Keeping children safe in education'

This policy operates in conjunction with the following school policies:

- Complaints Policy
- Data Protection Policy
- Child Protection and Safeguarding Policy
- Code of Conduct Staff Policy
- Positive Mental Health Policy

Definitions

Supervision – this is a regular, planned, two-way process in which a team of experts, such as the DSL and their deputies, will support and develop the knowledge, skills, and values of an individual staff member or group of staff members.

Critical reflection – the process of monitoring, reviewing and developing current practices.

Sessions – a scheduled, safeguarding supervision sessions

Roles and responsibilities

The governing board is responsible for:

- Monitoring the overall implementation of this policy.
- Handling complaints in accordance with the school's Complaints Procedures Policy.
- Holding the headteacher and lead supervisor to account for the performance of the school's supervision scheme.

The headteacher is responsible for:

- The day-to-day implementation and management of this policy.
- Working with the lead supervisor to identify staff members who require supervision sessions.
- Communicating any concerns about staff members to the lead supervisor.
- Liaising with the lead supervisor to monitor the progress of supervisees.
- Ensuring that employees understand and act in accordance with this policy.
- Selecting an appropriate safeguarding supervision team, such as the DSL, their deputies and senior leaders.
- Liaising with and monitoring the effectiveness of the safeguarding supervision team.
- Ensuring that all supervision meetings are scheduled appropriately and regularly, to ensure there are no interruptions and sessions are productive.
- Handling any complaints that are filed against the safeguarding supervision team or the supervisees, in accordance with the Complaints Procedures Policy.

The safeguarding supervision team is responsible for:

- Acting in accordance with this policy at all times.
- Organising and leading all sessions on a case-by-case basis.
- Maintaining rigorous and up-to-date records of the sessions.
- Preserving confidentiality, where possible.
- Creating an effective and supportive supervision schedule that accounts for the needs of individual supervisees.
- Ensuring that the school's safeguarding standards and requirements are met by implementing effective strategies for staff to develop their skills.
- Respecting diversity and proactively providing opportunities for supervisees to raise any diversity issues.
- Clarifying the tasks and areas of development that they expect the supervisee to complete.

- Offering constructive and balanced feedback, including setting clear targets for improvement and progression.
- Attending a monthly meeting, where the full safeguarding supervision team is present, to communicate potential areas of concern and discuss any other concerns the supervision team may have.
- Maintaining an up-to-date knowledge base with regards to safeguarding and making note of changes that may impact sessions, such as the release of new DfE guidance or updates to legislation.

The DSL is responsible for:

- Identifying which members of staff require supervision.
- Effectively delegating supervision responsibilities, such as allocating supervisees to supervisors.
- Liaising with the headteacher with regards to any complaints that have been filed in relation to the sessions.
- Overseeing the safeguarding supervision team and the organisation of all sessions.
- Attending weekly meetings with the headteacher to discuss the progress of supervisees and the effectiveness of the supervision team.

All supervisors are responsible for:

- Offering constructive and balanced feedback, including setting clear tasks and areas for development.
- Respecting diversity, proactively providing opportunities for supervisees to raise any issues with regards to this.
- Offering feedback to the lead supervisor based on the meetings with supervisees.

Supervisees are responsible for:

- Cooperating with the targets set by their supervisor.
- Contributing to sessions by communicating their particular areas of concern.
- Attending the sessions that are scheduled for them.
- Taking responsibility for their own learning and professional development, ensuring they keep up-to-date with developments.
- Communicating to the lead supervisor, where necessary, that they feel there is inadequate guidance and support being given to them.
- Actioning the targets that their supervisor sets them.

All staff members are responsible for:

- Identifying whether they need to be supervised, if they are not already and have not been identified by the lead supervisor.
- Ensuring they report all safeguarding concerns they have in line with the procedures laid out in the Child Protection and Safeguarding Policy

Key principles

Supervision will:

- Be a shared responsibility, with a clear supervision agreement between the headteacher, the supervisor and the supervisee.
- Have a pupil-centred approach and ensure that pupils' daily experiences are discussed and understood.
- Be an opportunity for reflective learning leading to informed actions.
- Be seen as an essential part of safeguarding practice and not as an optional activity.
- Meet professional standards – safeguarding requirements are met and sessions are conducted in a professional manner.
- Ensure supervisees understand their roles and responsibilities, the scope of their professional discretion and authority, and their accountability in safeguarding.
- Help to identify learning and development needs and promote the skills required to provide an effective education.
- Recognise the potential stresses in safeguarding practice and offer appropriate support.
- Establish clarity regarding information sharing in the interests of pupils.

Main functions of supervision

These functions will be carried out by supervisors when supporting supervisees; the lead supervisor will encourage supervisors to incorporate all these functions into their supervision meetings.

Management

This function is to ensure that the work for which the supervisee may be held accountable is carried out to a satisfactory standard. The management function will be delivered by a supervisor and achieved through discussion of:

- The overall quality of the supervisee's performance outcomes.
- The policies and procedures relating to their work and that these are understood and followed.
- The roles and responsibilities of the employee.

- The development and monitoring of action plans and objectives.
- Monitoring of the employee's workload.

Learning and development

This function is to encourage and assist supervisees in reflecting on their performance and to identify their learning and development needs. The learning and development function will be achieved through:

- Helping supervisees identify their preferred learning style and barriers to learning.
- Assessing development needs and identifying learning opportunities.
- Giving and receiving constructive feedback on performance.
- Encouraging the supervisee to reflect on learning opportunities undertaken and applying that learning to the workplace.

Support

This function is to provide support for supervisees to carry out their role. This will be achieved through:

- Creating a safe environment within supervision meetings where trust and confidentiality are maintained.
- Clarifying the difference in support and counselling between supervisors and supervisees.
- Enabling and empowering expression of feelings in relation to the supervisee's work role.
- Monitoring the health of the supervisee and referring to occupational health or counselling when appropriate.

Mediation

This function is to ensure that the relationship between the supervisee, their team, and other departments with whom they work are effective. This will be achieved through:

- Briefing the lead supervisor about key issues raised by supervisees.
- Dealing sensitively but clearly with complaints about colleagues.
- Consulting and briefing other members of staff on changes that affect their area of work.
- Mediating between the supervisee, their team and, if necessary, other departments in the school.

Types of supervision

All supervisees will be able to access this level of support.

Group supervision

This is the supervision of a number of supervisees who are all involved in the same tasks. Supervisees will meet with the supervisor to discuss issues about their work and/or the way they work as a team.

This can be done in the context of a team meeting or a separate session.

Unplanned or 'ad-hoc' supervision

The pace of work and the frequency of supervision mean that staff often have to obtain a decision or gain permission to do something in between formal supervision sessions.

In addition, supervisees who work closely with their supervisor will be communicating daily.

Where employees and supervisors work closely together this does not negate the need for private one-to-one time together on a regular basis.

If a supervisor is absent from work for more than one month, the lead supervisor should ensure that effective arrangements are in place for the supervision of the staff in that section.

Effective supervision

The headteacher and safeguarding supervision team will identify the staff members who require supervision sessions by monitoring appraisals, complaints and incidents that arise.

All staff members will be responsible for identifying whether they require supervision sessions. If a staff member is not receiving supervision sessions, they will contact the lead supervisor, who will arrange a meeting with the member of staff to discuss organising sessions.

Early career teachers (ECTs) and new starters will receive **two year** of compulsory supervision.

ECTs and new starters will consult their line manager with queries about procedural tasks before questioning their supervisor. This ensures that supervision sessions are used to maximum efficiency.

All members of staff will be reviewed by the headteacher **annually**, in order to determine if any staff members require supervision.

After an appraisal, the headteacher will communicate any areas of concern that they have with regards to particular members of staff to the lead supervisor and the safeguarding supervision team, who will establish, in a meeting with the individual, whether they require safeguarding supervision.

Supervisees will be honest and open in sessions, so that supervisors are able to support them effectively.

In addition to scheduled appointments, supervisors will organise drop-in sessions, where they have no scheduled appointments and they are free to be contacted by their supervisees.

Supervisors will be clear and concise when giving guidance to supervisees, to ensure that communication is effective and targets are understood.

If a supervisee does not understand any guidance given to them by their supervisor, they will seek clarification from their supervisor.

Supervisors will use supervision sessions as a way of monitoring progress made by supervisees.

Supervisors will ensure that their knowledge and skillset are accurate and up-to-date by continually attending training days and monitoring sector updates.

Supervisors will plan the agenda for each session, outlining any issues that they wish to discuss with their supervisee, to ensure the session is focussed.

Supervisees will also plan their agenda for each supervision session, outlining the areas in which they require guidance or feel they could improve upon.

Frequency of supervision

The level of supervision required will reflect the employee's level of experience, competence and needs. Particular circumstances that apply to the employee, e.g. work-related stress, may mean that they require more frequent supervision.

The frequency of supervision may depend on a number of factors including staff ratios, availability of supervisors and availability of rooms, for example. "Appropriate arrangements" should be in place with sessions held sufficiently often to allow it to be a meaningful experience for both the supervisee and supervisor and to ensure the purpose of supervision, as outlined above, is met.

Staff in direct contact with children are supervised no less than **once every term**. ECTs and new starters will have **weekly** sessions with their supervisor.

The actual frequency for individuals will be agreed between the supervisor and employee when negotiating a supervision agreement. Sessions will be arranged sufficiently often, on a case-by-case basis, to allow the supervision to be a meaningful experience that benefits the supervisee.

Any deviation from the recommended frequency detailed above, as a permanent feature, will be by agreement between the two parties and should be clearly recorded in the individual supervision agreement.

Agency and temporary staff will receive supervision in the same way as permanent staff, following the same process detailed above.

Disciplinary measures will include an increase in formal supervision.

The table below shows the frequency of supervision meetings for staff.

Staff member groups	Supervision frequency
<u>Site staff, including the site manager</u>	<u>Twice per year</u>
<u>ECTs</u>	<u>Weekly</u>
<u>Classroom teachers</u>	<u>Once per term</u>
<u>SEND team</u>	<u>Twice per year</u>
<u>SLT</u>	<u>Once per term</u>

Volunteers

The school will decide on a case-by-case basis whether to consider a volunteer for supervision. Where the decision is made to supervise a volunteer, the school will have regard to the statutory guidance issued by the Secretary of State that can be found in

Annex E of 'Keeping children safe in education' to help determine the appropriate level of supervision.

The supervision will be:

- By a person who is in regulated activity relating to children.
- Regular and day-to-day.
- Reasonable in all circumstances to ensure the protection of children.

Supervision agreements

All supervisors and supervisees will enter into an agreement to ensure supervision meetings are kept to.

The supervision agreements will address the following points:

- The objectives and purpose of supervision, e.g. to help integrate an ECT or to provide training around new statutory guidance
- The content of supervision, e.g. discussing new ideas and acquiring knowledge
- The responsibilities of the supervisor, e.g. to offer constructive feedback to the supervisee
- The rights and responsibilities of the supervisee, e.g. to be open to new ideas

Procedural considerations, e.g. how notes from meetings will be recorded and a review timeline, will be included in the agreement.

To cater for staff members' workloads, supervision agreements do not specifically set dates for meetings. The purpose and objectives of the Supervision Agreement can be amended at any time but must be authorised by the headteacher.

Training

To ensure the best quality supervision, supervisors will undertake supervision training **annually** to consolidate their skills and knowledge.

As part of their inductions, all new members of staff will receive an introduction to the school's supervision methods and familiarise themselves with this policy.

Supervisors and supervisees will meet **biannually** to discuss whether there are any additional needs that should be addressed during supervisors' training.

During these **biannual** meetings, supervisors will request feedback from supervisees – this feedback will inform the training supervisors undergo.

Supervisors will keep up-to-date with sector updates and new guidance to train supervisees and ensure they can sufficiently prepare for new requirements.

Group sessions will be held to ensure all supervisees understand the implications and effects of new statutory guidance – supervisors will offer additional support to supervisees to help them adjust to new requirements.

Critical reflection

Critical reflection will be used to enable members of staff to establish the most effective methods in safeguarding practice, by evaluating the areas of improvement and adjusting the relevant policies and procedures accordingly.

Supervisees will use sessions to critically reflect upon their understanding and application of knowledge, theory and skills, considering how these impact pupils and making the appropriate adjustments, such as undertaking further training.

As appraisals and performance management overlap, in terms of their remit, sessions and the progress made due to them will be considered during appraisals.

Supervisors will monitor recurring areas of concern and will address these matters as a full safeguarding supervision team, ensuring that the school's practices are effective.

Any practices that require development will be communicated by the lead of the safeguarding supervision team to the headteacher and the governing board.

As the headteacher and the governing board are responsible for reviewing and developing any practices, they will decide, considering the plans suggested by the full safeguarding supervision team, what action should be taken.

Supervision will be used as part of a wider performance management framework, which will include:

- The recruitment and selection process.
- Effective induction to the school and its ethos.
- Clear policies, practices and the corresponding guidance.
- Clear school standards.
- Training which is based on workforce planning.
- Regular appraisals.
- The staff capability framework, e.g. key performance indicators.
- Staff-wellbeing resources.
- A clear disciplinary code.

Recording

All records are kept in accordance with the school's Records Management Policy.

Access to supervision records will be controlled in accordance with the school's Data Protection Policy and only the headteacher will grant staff members permission to review records.

Staff members can request a copy of their supervision records at any time, by speaking to the lead supervisor.

Records of sessions will be kept to:

- Account for what was discussed and what actions were agreed.
- Account for any disagreements.
- Benchmark and audit the quality of supervision.
- Monitor the performance of supervisees.

The supervisor will make a record of each session. Records will be signed and dated by both the supervisor and supervisee.

Confidentiality

It is important for staff to be comfortable in discussing all aspects of their work but there needs to be clarity as to what will happen to information discussed if it raises concerns about the practice of a particular member of staff or a child. Accordingly, any supervision policy must be compatible with the safeguarding children, allegations against staff and confidentiality policies within the school. Any records agreed through the supervision contract should be maintained confidentially and not be accessible to other school staff.

Complaints

All complaints in relation to supervision and this policy will be handled professionally and in accordance with the school's Complaints Procedures Policy.

If a supervisor or supervisee has a complaint, they will report it to the chair of governors immediately.

Monitoring and review

This policy is reviewed **annually** by the headteacher, the DSL and the governing board.

All changes made to this policy are communicated to all staff members by the DSL.

The next scheduled review date for this policy is **September 2026.**

