

## New Ways School Safeguarding and Child Protection Policy 2026/27

| Important Information                 |                                                           |
|---------------------------------------|-----------------------------------------------------------|
| Headteacher                           | Sarah Gould                                               |
| Executive Headteacher                 | Louise Reeks                                              |
| Designated Safeguarding Lead          | Louise Reeks                                              |
| Deputy Designated Safeguarding Lead/s | Violet Watson (New Ways)<br>Vicky Jones (Corbett House)   |
| Mental Health First Aider/s           | Anna Pickering (New Ways)<br>Mary Hood (Corbett House)    |
| Prevent Lead                          | Louise Reeks                                              |
| LAC / PLAC Lead                       | Cheryl Haighway (New Ways)<br>Vicky Jones (Corbett House) |
| Safeguarding Governor                 | Martin Keightley                                          |
| Chair of Governing Body               | James Madine                                              |
| Director of Safeguarding              | Julie Hamilton                                            |
| LADO *name and authority              | Duty LADO - Birmingham                                    |



Abuse of ANY kind will not be tolerated at New Ways School

# Safeguarding and Child Protection Policy



|                         |             |                              |                       |
|-------------------------|-------------|------------------------------|-----------------------|
| <b>Policy Number:</b>   | EDU.POL.020 | <b>Policy Owner Job Role</b> | S/G Assurance Manager |
| <b>Issue Number:</b>    | 011         | <b>Ratified By</b>           | Quality Director      |
| <b>Issue Date:</b>      | 24.08.2026  | <b>Service Type:</b>         | Education             |
| <b>Contributors</b>     | Kate Martin | <b>Applicable Services:</b>  | Schools               |
| <b>Mandatory Policy</b> | Yes         | <b>To be reviewed:</b>       | 01.09.2027            |

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## Section 1 – Supporting Documents

This policy is based on the Department for Education's (DfE's) statutory guidance documents:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026 update)
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014

This policy has also been created in accordance with the following key documents:

- SEND Code of Practice
- Regulatory Inspection Handbooks (Reviewed summer 2026)
- Equality Act 2010
- Human Rights Act 1998
- Working Together to improve school attendance (July 2026 update)
- Prevent Duty Guidance (2024 update)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015

This policy should be read in conjunction with the following Keys Education policies:

- RSHE Policy (26/27)
- Behaviour Policy (26/27)
- Positive Handling and Physical Intervention Policy (26/27)
- Anti-Bullying Policy (26/27)
- Risk Assessment Policy (26/27)
- Supervision of Pupils Policy (26/27)
- Mobile Phone Policy (26/27)
- SEND Policy (26/27)
- First Aid Policy (26/27)
- Allergy Safety Policy (26/27)
- Medical Conditions and Medication Policy (26/27)
- Mental Health and Wellbeing Policy (26/27)
- Suspension and Permanent Exclusions Policy (26/27)
- Alternative Provision Policy (26/27)
- Attendance Policy (26/27)
- Children Missing Education Policy (26/27)
- Admissions Policy (26/27)
- Staff Code of Conduct Policy (26/27)
- Whistleblowing Policy (26/27)

Related policies are held within Radar in the school's policy folder.

## Section 2 – Introduction

New Ways School is committed to creating a culture where:

- children feel safe.
- concerns around pupils' safety and/or welfare are identified early.
- concerns are acted upon promptly.
- children are listened to.
- children know how to access support.
- staff understand their safeguarding responsibilities.
- safeguarding is embedded throughout all school activities.
- The welfare of the child is always paramount to all members of our school community.

## Section 3 - Equality Statement

At New Ways School the welfare of the child is always paramount. All decisions made by school staff will place the child's safety, wellbeing and best interests at the centre of decision-making.

We also recognise that our pupils often have additional vulnerabilities due to their Special Educational Needs and Disabilities (SEND) – including communication needs, social, emotional and sensory needs and mental health needs. This can often sit alongside a history of trauma (including education-based trauma) and complex attachment profiles, and a range of adverse childhood experiences. These factors can increase both the risk of abuse taking place but also increase the barriers to recognising and reporting abuse.

All staff are committed to anti-discriminatory practice and recognise our pupils' diverse needs and circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

In addition to their SEND, we also give special consideration to pupils who may have additional vulnerabilities due to the following:

- Pupils who are young carers.
- Pupils who may face discrimination due to ethnicity, religion, gender identification or sexuality.
- Pupils and families where English is an additional language (EAL).
- Where pupils are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Pupils who are at increased risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation.
- Pupils who are refugees or asylum seekers.
- Pupils who are at risk due to either their own or a family member's mental health needs.
- Pupils with a family member in prison.
- Pupils who are looked after or previously looked after.
- Pupils who are missing or absent from education for prolonged periods or have a pattern of frequent absence.

- Pupils who have a chronic or life limiting illness.
- A pupil whose parent/carer has expressed an intention to remove them from school to be home educated.

## **Section 4 - Aim**

The aim of this Safeguarding and Child Protection Policy is to ensure that every pupil at New Ways School is safe, valued, respected, and able to learn and thrive within a secure environment.

The policy provides a clear framework for preventing harm, identifying concerns at the earliest opportunity, and responding effectively to safeguard children and young people. It promotes a culture of vigilance, shared responsibility, and inclusive practice, ensuring that all staff, governors, volunteers, and partners work together to protect pupils' welfare, promote their wellbeing, and uphold their rights.

## **Section 5 - Definitions**

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. It can include physical, sexual or emotional elements.

Abuse can be perpetrated by adults or children; it can be perpetrated by individuals, groups and organised networks. Abuse may also include children causing harm to adults (sometimes called 'child to parent' or 'child to caregiver' abuse.)

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

Sharing of self-generated intimate images (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

'Children' includes everyone under the age of 18.

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

identifying and responding to their needs:

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

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

'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## **Section 6 - Confidentiality**

Confidentiality is an important element of safeguarding practice; however, safeguarding concerns must never be kept secret.

Effective safeguarding depends upon timely information sharing and all staff understand that fears about sharing information must never stand in the way of promoting the welfare and safety of children. Information will only be shared on a need-to-know basis with professionals who have a legitimate safeguarding responsibility.

The school recognises that:

- the Data Protection Act 2018 and UK GDPR do not prevent the sharing of safeguarding information where this is necessary to protect a child.
- special category personal information may be shared without consent when safeguarding a child or vulnerable person.
- staff must never promise confidentiality to a child who makes a disclosure.
- the wishes and feelings of the child will always be considered, but safeguarding responsibilities remain paramount.
- parents/carers will normally be informed of safeguarding concerns unless doing so would place a child at increased risk of harm.

Where allegations involve sexual violence or sexual harassment, the Designated Safeguarding Lead (DSL) will carefully balance:

- the wishes of the child.
- the need to protect the child.
- the need to protect other children.
- statutory reporting requirements.

The school follows the Government's Information Sharing Advice for Safeguarding Practitioners and the seven golden rules of information sharing.

All safeguarding records are maintained securely on CPOMS and are only accessible to authorised personnel. Safeguarding records are retained and transferred in line with statutory guidance.

## **Section 6.1 - Information Sharing**

The school recognises that safeguarding is a shared responsibility requiring effective partnership working.

We work closely with:

- Children's Social Care
- Police
- Health services
- Virtual School Heads
- Local Safeguarding Children Partnerships
- Integrated Care Boards
- Alternative Providers
- Therapeutic and Clinical Services
- Other education providers

All staff understand their responsibility to:

- report concerns promptly.
- record concerns accurately.
- share information with the DSL without delay.
- support multi-agency safeguarding arrangements.
- contribute to assessments and safeguarding plans when required.

Where a child transfers to another education setting, safeguarding records will be transferred securely and separately from the educational file through CPOMS or secure transfer systems within:

- five working days for an in-year transfer; or
- the first five days of a new term.

Where concerns are complex, the DSL will speak directly with the DSL at the receiving school to ensure a clear handover of information.

## **Section 6.2 - Whistleblowing**

The school promotes a culture of openness, transparency and professional challenge.

All staff have a duty to raise concerns where they believe:

- safeguarding procedures are not being followed.
- a child may be at risk of harm.
- poor or unsafe practice may place children at risk.
- a colleague's conduct is inconsistent with professional expectations.

A culture of openness and professional dialogue is established at New Ways School however, in the event that this has not been appropriate or successful, or that colleagues have not felt able to use this approach then the following routes are available:

Concerns should normally be raised with:

- the Headteacher and/or DSL (then)
- the Regional Director (then)
- the Education Director

In the case of Safeguarding concerns however, staff can also contact:

- the Safeguarding Governor, Martin Keightley
- the Director of Safeguarding, Julie Hamilton
- the Chair of the Proprietary Board, David Manson

Staff can also contact Human Resources.

Staff may also access external whistleblowing routes as detailed in the wider Keys whistleblowing policy available on Radar or Circle. This includes an anonymous whistleblowing service.

## **Section 7 - Child-on-child abuse**

It is recognised that children may sometimes abuse other children. Such behaviour will not be tolerated or dismissed as banter, humour, or part of growing up, as this could contribute to inappropriate behaviour and an unsafe environment for pupils.

### **Section 7.1 - Allegations of abuse by a pupil against another pupil/s (known as child-on-child abuse)**

Incidents where pupils harm others are typically addressed thoroughly and appropriately under the school's behaviour policy. However, this policy will apply to cases involving behaviour that is significant enough to be considered a safeguarding concern. Some of the reasons for this may include, but are not limited to:

- Abusive or violent behaviour that may constitute a criminal offensive.
- Abusive or violent behaviour that may place pupils at an ongoing risk.
- Discriminatory behaviour, including racism and faith targeted abuse.
- Behaviour that was sustained, planned or promoted (advertised).
- Behaviour that involved coercion or forcing children to use drugs or alcohol.
- Any involvement of sexual exploitation, sexual abuse, or harassment - including indecent exposure, sexual assault, upskirting, sharing of self-generated intimate images (including AI/Deepfakes), or creating deep-fake explicit images.
- Abusive or violent behaviour that has been filmed, shared online, or distributed by other means.
- Any behaviour that is linked to any other concerning behaviour.

## **Section 7.2 - Procedures for dealing with allegations of child-on-child abuse**

Allegations by a pupil against another pupil will follow established safeguarding procedures (see appendix 1 section A and B), reported to the DSL and recorded on CPOMS.

Ensure reporting to the police is done quickly and in line with guidance around children and the law (access to responsible adults and informing parents/carers).

If the incident involves a potential criminal offence and there are delays in the criminal process, the DSL will cooperate with the police and other agencies as needed, while taking necessary measures regarding pupil safety and discipline.

## **Section 7.3 - Creating a supportive environment to minimise the risk of child-on-child abuse**

The importance of proactive action to reduce risks associated with child-on-child abuse and fostering a supportive reporting environment is acknowledged.

To support this, the school will:

- address derogatory or sexualised language and inappropriate behaviour between pupils.
- monitor issues that affect different genders.
- use the curriculum to educate pupils about appropriate, socially expected, and criminal behaviour, with particular attention to pupils with SEND who may find these concepts challenging.
- ensure accessible reporting systems for all pupils.
- remain alert to reports of violence or harassment, particularly those of a sexual or discriminatory nature, which may indicate broader issues. Identified issues will be handled through curriculum adaptation, staff training, policy updates, and, if suitable, collaboration with safeguarding partners.
- provide support for pupils affected by or witnessing child-on-child abuse, ensuring that all parties involved are protected from bullying or harassment.
- train staff to recognise indicators of child-on-child abuse and to respond appropriately, maintaining an outlook that such abuse could occur even in the absence of reports.

Disciplinary measures may proceed alongside external investigations, such as those by law enforcement. The school will determine on a case-by-case basis whether disciplinary actions might affect ongoing investigations and will consult with appropriate authorities as needed. Consideration will also be given to circumstances where conducting an internal review may not be reasonable during an independent investigation.

## **Section 7.4 - Sharing of nudes and semi nudes**

Current guidance for educational settings (UK Council for Internet Safety, 2024) defines this as sending or posting nude or semi-nude images, videos, or live streams online by individuals under 18. Alternative terminology may include 'dick pics' or 'pics'. Motivations behind sharing such imagery may not always be sexual or criminal.

**This guidance does not apply to adults sharing images of individuals under 18. Such behaviour is categorised as child sexual abuse and must be reported to the police immediately. This includes where a pupil has reached the age of 18 and is sharing images of other pupils.**

**All staff** are required to follow reporting and recording protocols as outlined in Appendix 1 Sections A & B.

**Staff must not:**

- delete any image or instruct a pupil to do so.
- view, copy, print, share, store, or retain such imagery or ask a pupil to do so; doing so can constitute a criminal offence. If imagery is viewed inadvertently, staff must report this to the DSL in writing immediately.

**In exceptional situations, the DSL (or equivalent) may view the image solely for safeguarding purposes, using professional judgement, and recording clearly rationale and actions taken.**

### **Referring to the police**

Decisions to refer incidents to the police or social care will be made individually, considering all relevant context. Where referral is required, the DSL (or headteacher) will contact the police via 101.

## **Section 8 - Specific areas of concern and pupils with specific vulnerabilities**

### **Mental Health (see also appendix 9 and 10)**

At New Ways School we recognise that Mental Health concerns may also quickly become safeguarding concerns, and that pupils with SEND, or those who have experienced trauma, are more likely to experience some mental health difficulties at some point in their lives.

Where mental health concerns become safeguarding concerns, safeguarding procedures will take precedence, and referral pathways will be activated. School leaders will also consider use of safety plans (appendix 9 and 10).

Our school works closely with the clinical team to ensure all staff have a developed understanding of mental health needs and signs to look out for.

### **Prejudiced based-harm or discrimination**

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

### **Gender Identity and Social Transitioning**

The school recognises that children who are questioning their gender may experience additional vulnerabilities including:

- Bullying
- Discrimination
- Social isolation
- Exploitation
- Poor mental health outcomes

All pupils will be treated with dignity, respect and compassion, and all adults will approach conversations with an empathetic professional curiosity. All conversations related to gender questioning and social transitioning should be logged on CPOMS.

The school will:

- take a child-centred approach.
- work closely with parents and carers, unless to do so would put the pupil at risk of harm\*.
- consider wider safeguarding vulnerabilities, and developmental, SEND profiles.
- seek appropriate clinical guidance where required.
- carefully assess any proposed social transition arrangements, and unless unsafe to do so, no school should consent to socially transition a pupil without consent or knowledge of parent/carers\*
- maintain detailed safeguarding records logging clearly all decisions made, actions taken and the rationale behind these.
- ensure a pupil who has socially transitioned is treated with dignity and respect and given access to appropriate facilities to maintain this.
- give consideration to children who are living in stealth (that is those who have socially transitioned pre-puberty, and whose biological sex may not be known to their peers or to a wider staff team) as they present a significant vulnerability. Staff will be especially aware of the risk as children in this category approach key milestones such as adolescence and puberty.

*\*Where a pupil requests social transition without parent/carer knowledge, the headteacher, education director, safeguarding director and other relevant professionals will be consulted before decisions are made about what information should be shared in the child's best interests.*

### **Pupils with Special Educational Needs or Health Conditions**

We acknowledge that pupils with special educational needs and disabilities (SEND) or certain health conditions may experience heightened safeguarding challenges and are statistically more susceptible to abuse than their peers.

Recognising abuse and neglect within this group can present additional complexities, such as:

- attributing indicators of possible abuse—including changes in behaviour, mood, or injury—solely to the child's needs or health condition without adequate investigation.
- the potential for pupils with SEND, disabilities, or specific health conditions to be disproportionately affected by behaviours such as bullying, even if they do not display outward signs.
- communication barriers and challenges in reporting or managing these concerns.

To address these issues, we provide targeted training for staff on specific safeguarding considerations related to pupils with SEND and health conditions.

### **Pupils with a Social Worker**

Some pupils require the support of a social worker due to safeguarding or welfare concerns. We recognise that adverse experiences and trauma can increase a child's vulnerability to further harm and impact attendance, learning, behaviour, and mental health. The DSL and all staff members

collaborate closely with social workers to protect vulnerable children.

When it is known that a pupil has a social worker, the DSL always considers this information to ensure decisions prioritise the pupil's safety, welfare, and educational outcomes. For instance, this may guide responses to:

- unauthorised absences or missing education where safeguarding risks are identified.
- provision of pastoral or academic support as appropriate.

### **Looked-after and Previously Looked-after Children**

We are committed to ensuring that staff possess the knowledge, skills, and understanding necessary to safeguard looked-after and previously looked-after children. Specifically, we ensure that:

- relevant staff members are informed about children's legal care status, contact arrangements with birth parents or individuals with parental responsibility, and current care provisions.
- the DSL maintains up-to-date details of each child's social worker and relevant Virtual School headteachers.

The headteacher is responsible for promoting the educational achievement of looked-after and previously looked-after children. As part of this role, the headteacher will:

- work in partnership with the DSL to ensure safeguarding concerns regarding looked-after and previously looked-after children are addressed swiftly and effectively.
- collaborate with Virtual School heads to support and enhance the educational progress of these children.

## **Section 9 - Concerns about a staff member, supply teacher, volunteer or contractor**

If there are concerns regarding any individual employed in the school, whether directly or through a contract, who may pose a risk of harm to children, or if an allegation is made, all staff must report this to the headteacher immediately, and no later than the end of the working day. Should the concern or allegation pertain to the headteacher, it is the responsibility of the staff member to notify the chair of governors (James Madine) and the Regional Director.

If a conflict of interest exists in reporting a concern or allegation about any individual working within the school to the headteacher, staff must report the matter directly to the regional executive headteacher, (where one is in place) or the regional director in the first instance. They may also report their concern to the chair of governors if this is a preferred choice.

The headteacher or the chair of governors will then proceed in accordance with the procedures outlined in appendix 1 and 5, where applicable.

### **Low Level Concerns**

A low-level concern refers to any issue, regardless of its significance, including those that may simply cause unease or a sense of 'nagging doubt'. Such concerns arise when an adult working in or on behalf of

the school is perceived to have acted in a manner inconsistent with Keys' code of conduct - this includes inappropriate conduct outside of work - but does not meet the threshold for harm or a referral to the local authority designated officer. **This will be recorded on the school's low-level tracker.**

Examples of low-level concerns include, but are not limited to:

- demonstrating excessive familiarity with pupils, leading to blurred boundaries;
- displaying possible favouritism or engaging with a pupil one-on-one in a secluded area or behind a closed door;
- using language that is inappropriate (but not abusive, sexualised or prejudiced) in an isolated incident.

**All staff are required to report low level concerns to the headteacher at the earliest opportunity.**

Whenever feasible, this should be communicated via email; if reported verbally, the headteacher will document the conversation in writing.

**Headteachers are responsible for maintaining comprehensive records of all low-level concerns and actions taken using the low-level concerns log.**

## **Section 10 - Responsibilities**

Safeguarding and child protection are collective responsibilities. This policy is applicable to all staff, volunteers, and governors within the school and aligns with procedures set forth by the three safeguarding partners. The scope also extends to cover school and any off-site activities.

It is our duty to ensure any alternative provision employed upholds robust and appropriate safeguarding measures. The practices described herein are consistent with the Non-Association Independent School Inspection Handbook, particularly concerning leadership and management, where safeguarding serves as a limiting judgement factor—as well as the standards set out in Independent School Standards. Clear accountability, escalation protocols, and demonstrable safeguarding practices directly contribute to positive inspection outcomes; thus, all staff must be fully conversant with their obligations.

**All staff are required to:**

- read all of and understand Part One of *Keeping Children Safe in Education* (KCSIE) review it annually and affirm their understanding via a signed declaration each academic year.
- reinforce online safety when communicating with parents/carers, including guidance on children's online activities.
- provide safe spaces for LGBTQ+ pupils to express concerns.

**All staff will also be aware of and utilise:**

- the school's safeguarding infrastructure (this policy, behaviour policy, online safety policy, medication and allergy policies), risk assessments, CPOMS, DSL/DSLs, provide response protocols to any significant operational issues.
- their role in early intervention (identifying emerging concerns, liaising with the DSL/DSLs, and sharing information appropriately).

- procedures for referring cases to children's social care and statutory assessments, and their potential involvement in these processes.
- appropriate responses to child disclosures of abuse or neglect, including FGM, maintaining confidentiality, and collaborating with professionals.
- indicators of abuse or neglect and specific issues such as peer-on-peer abuse, CSE, CCE, serious violence/county lines, radicalisation, and FGM.
- the importance of reassuring children that their concerns are taken seriously and support will be provided.
- protocols around contextual safeguarding. Recognition that risks may arise both inside and outside the home, in school, or online.
- policies and strategies promoting support for LGBTQ+ children, or those perceived as such, who may experience additional risks.
- understanding that children with SEND are at greater risk and may face further vulnerabilities compared to their peers without SEND.
- policies and strategies promoting supporting pupils with mental health as a safeguarding concern and the pathway to follow, following a concern.

### **Designated Safeguarding Lead (DSL)**

The DSL holds primary responsibility for child protection and safeguarding, including online safety and filtering/monitoring.

The DSL is accountable for:

- keeping leaders informed.
- liaising with the local authority, LADO, police, and safeguarding partners.
- maintaining awareness of local specialist support available for victims and alleged perpetrators.
- ensuring the presence of an "appropriate adult" during police involvement with pupils.

If the DSL is off the premises, they will ensure that all staff are made aware of their absence and who they should report concerns to and in what manner.

### **Headteacher Responsibilities**

The headteacher is accountable for:

- inducting all staff and volunteers (including temporary personnel) into the school's safeguarding systems and procedures and ensuring adherence to referral processes.
- acting as the "case manager" for allegations concerning staff or volunteers.
- making determinations on low-level concerns (consulting the DSL as appropriate).
- communicating this policy to parents/carers and ensuring publication on the school website.
- providing the DSL with sufficient time, training, and resources.
- ensuring that safeguarding data is effectively reported to governors at least once a term to enable them to maintain sufficient strategic oversight of safeguarding compliance and any serious or significant events.

### **New Ways School – Safeguarding and Child Protection Policy**

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## **Governing Board Responsibilities**

The governing board shall:

- implement a whole-school approach to safeguarding, integrating it across all policies and processes.
- approve and annually review this policy, ensure compliance, and hold the headteacher accountable.
- fulfil duties pertaining to the Human Rights Act 1998, Equality Act 2010, and local safeguarding arrangements.
- appoint a senior board-level lead (Group Safeguarding Director Julie Hamilton) independent of the DSL, to oversee the efficacy of safeguarding policies.
- ensure mandatory safeguarding/child protection training for all staff, inclusive of online safety, with regular updates.
- oversee the implementation of suitable filtering and monitoring systems, ensuring comprehension among staff and alignment with DfE standards.
- grant the DSL the requisite authority, resources, and time necessary to execute their role.
- ensure processes are established for managing low-level concerns and compliance with these procedures (see para 9.2).
- appoint a governor as “case manager” should there be allegations against the headteacher.

## **Contextual Risk Assessment (also see appendix 6)**

Contextual Risk Assessments identify risks to pupils beyond the home, including within the local community and physical risks in or near the school environment. These assessments must be completed at the beginning of the school year in accordance with KCSIE updates and reviewed at the start of each term by the DSL and leadership team. Templates should be completed comprehensively and updated with input from local intelligence sources (police, local authority safeguarding teams, and community partners). Reviews will be minuted, and outcomes communicated to staff as appropriate. Governors will review the updated assessments each term.

## **Oversight and Quality Assurance**

Governors, the education director, and the Keys Safeguarding Compliance Team have explicit oversight functions, including regular analysis of safeguarding data, termly reviews of contextual safeguarding risk assessments, and clear escalation procedures in instances where risks or deficiencies are identified. This structure satisfies inspection criteria requiring governance to demonstrate strategic challenge and effective oversight. Further details can be found in the appendices.

## **Preventative Education Responsibilities**

The school plays an integral part in preventative education, adopting a whole-school approach to equip pupils with the knowledge and skills necessary for life in contemporary Britain. A zero-tolerance culture towards sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment underpin this work, supported by our:

- Behaviour Policy.

- Pastoral support system.
- Regularly delivered, inclusive PSHE and RSHE curriculum encompassing:
  - Healthy and respectful relationships.
  - Boundaries and consent.
  - Stereotyping, prejudice, and equality.
  - Hate speech versus free speech.
  - Body confidence and self-esteem.
  - Recognition of abusive relationships, including coercive and controlling behaviours.
  - Laws relating to sexual consent, exploitation, abuse, grooming, harassment, rape, domestic abuse, forced marriage, honour-based violence, FGM, and access to support.
  - What constitutes sexual harassment and sexual violence, and unequivocal condemnation of such behaviour.
  - Bullying and discrimination (including racism, ableism, sexism, homophobia, transphobia, and other forms of prejudice).
  - Online safety (privacy, digital footprint, misinformation/disinformation, cyberbullying, gaming risks, AI/deepfake challenges).
  - Mental and physical health and self-care.
  - Diversity and inclusion (celebrating differences, disability awareness, LGBTQ+ inclusion).
  - Exploitation and broader contextual risks.
  - Economic wellbeing and online pressures (advertising, scams, gambling, financial decision-making).
  - Preparation for independence (safe travel, responsible decision-making, personal responsibility).
  - Our school is dedicated to tackling violence against women and girls. We will implement preventative education programmes that address this issue, promoting a culture of respect and safety for all pupils. Staff will be trained to recognise and respond to signs of violence and abuse, ensuring that appropriate support and interventions are provided.

## Section 11 - Training

Staff and Governors should consult Appendix 8: Checklist for Governors, which outlines statutory duties and procedural requirements for induction and refresher training.

### All staff

All staff participate in safeguarding and child protection training as part of their induction, including training related to whistleblowing procedures and online safety, to ensure familiarity with the school's safeguarding systems and responsibilities, as well as recognition of potential indicators of abuse or neglect.

Training is updated regularly and designed to:

- be embedded within the whole-school safeguarding policy, wider staff training, and curriculum planning.

- align with the guidance provided by safeguarding partners.
- address online safety expectations, roles, and responsibilities regarding filtering and monitoring.
- reference Teachers' Standards, supporting expectations that all teachers:
  - manage behaviour appropriately to maintain a safe environment.
  - understand the needs of all pupils.

All staff complete training on the government's anti-radicalisation strategy, Prevent, aimed at recognising children at risk of involvement in terrorism and addressing extremist ideas.

Ongoing safeguarding and child protection updates, including topics on online safety, are provided as needed, and at least annually (for example, via emails, e-bulletins, or staff meetings).

Volunteers receive relevant training where applicable.

### **The DSL and Deputy DSLs**

The Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Leads (DDSL) will:

- undertake appropriate Level 3 child protection and safeguarding training at least every two years.
- update Prevent training every two years as well as when guidance changes.

In addition, the DSL and DDSLs will update their knowledge and skills at regular intervals, and at least annually, in order to:

- understand and keep up with any developments relevant to their role;
- maintain the knowledge and skills required to carry out the role effectively;
- understand local safeguarding arrangements and referral pathways; and
- remain aware of emerging safeguarding risks and national developments.

They also update their knowledge and skills regularly, at least annually, using resources such as e-bulletins, networking with other DSLs, attending Keys Education DSL events, or reviewing current safeguarding developments.

### **Governors**

All governors complete Level 3 safeguarding and child protection training (including online safety and Prevent training) during their induction. They complete regular updates in line with Keys compliance – usually every three years or when guidance changes. This ensures they:

- possess the necessary knowledge and information to perform their functions and understand their responsibilities, including providing strategic challenges.
- can confirm that safeguarding policies and procedures are effective in delivering a comprehensive approach to safeguarding.

The chair of governors receives additional training in managing allegations, as they may need to act as the 'case manager' if an allegation is made against the headteacher.

### **Recruitment – interview panels**

At least one member of every interview panel completes safer recruitment training, which covers at minimum the contents of Keeping Children Safe in Education and complies with local safeguarding procedures.

#### **Staff who have contact with pupils and families**

Staff working directly with children and families participate in supervision sessions with their line manager. These sessions offer support, coaching, training, promoting the interests of children, and provide opportunities for confidential discussions of a sensitive nature.

### **Section 12 - Appendices:**

#### **Appendix 1: Procedures for Reporting and Recording Concerns**

#### **Appendix 2: Recording and Storing Data**

#### **Appendix 3: Recruitment and Selection Process**

#### **Appendix 4: Designated Leads in School**

#### **Appendix 5: Reporting and Referring Contact Information**

#### **Appendix 6: Contextual Safeguarding Information and Location Risk**

#### **Appendix 7: Safeguarding Oversight and Information for Display**

#### **Appendix 8: Checklist for staff and Governors**

#### **Appendix 9: School Specific Mental Health Guidance**

#### **Appendix 10: Template Pupil Safety Plan**

#### **Appendix 11: Version Control Table**

#### **Appendix 12 – Types of Abuse**

#### **Appendix 13 – Specific Safeguarding Issues**

## **Appendix 1: Procedures for Reporting and Recording Concerns**

### **Recognising Abuse and Taking Action**

All staff members, volunteers, and governors are required to adhere to the following procedures in the event of a safeguarding concern.

Please note: In this and subsequent sections, any reference to the Designated Safeguarding Lead (DSL) also applies to any Deputy DSL.

### **SECTION A: Immediate Actions if a Child is Suffering or Likely to Suffer Harm, or is in Immediate Danger**

- 1) Report the concern to the DSL.
  - a) If the DSL is unavailable, report to the headteacher.
  - b) If neither is available, you must immediately refer the matter to children's social care and/or the police if you believe a child is at risk of harm or in immediate danger. Any individual can make such a referral.
- 2) Document all details related to the concern and/or referral on CPOMS as soon as possible, and no later than the end of the working day.

### **SECTION B: Responding to a Disclosure of a Safeguarding Issue by a Child**

- 1) Listen attentively and take the disclosure seriously, allowing the child sufficient time to express themselves without asking leading questions.
- 2) Remain calm and do not display shock or distress.
- 3) Acknowledge the child's decision to confide in you and refrain from suggesting they should have disclosed sooner.
- 4) Explain the next steps, clarifying that you are obligated to share this information. Do not promise confidentiality.
- 5) Record the conversation at the earliest opportunity on CPOMS, prior to the close of the working day. Ensure an objective account is provided, delineating direct quotations from the child using quotation marks.
- 6) Follow the reporting procedures outlined in Section A.

### **SECTION C: Addressing Concerns Not Based on Direct Disclosure**

Be mindful that some children may:

- not feel prepared or know how to disclose abuse, exploitation, or neglect.
- fail to identify their experiences as harmful.
- feel embarrassed, ashamed, or threatened. These feelings may arise due to vulnerability, disability, sexual orientation, or language barriers.

These factors must not deter you from exercising professional curiosity. If you have concerns about a child, consult the DSL and ensure these concerns are recorded on CPOMS promptly. If necessary, follow the processes described in Section A.

## **SECTION D: Female Genital Mutilation (FGM)**

Any teacher who becomes aware of or has credible evidence that a child has been subjected to FGM, as defined below, is legally required to report this directly and immediately to the police. This statutory duty carries disciplinary consequences for non-compliance. The requirement does not apply in cases where a pupil is at risk of FGM or suspicion exists without confirmation. Staff must not physically examine pupils. If there is risk or suspicion, teachers should follow the procedures detailed in Section A.

Unless instructed otherwise, staff should also discuss the case with the DSL and involve children's social care as appropriate.

### **Definition of FGM:**

In accordance with Keeping Children Safe in Education, FGM includes "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs."

FGM is illegal in the UK and constitutes a form of child abuse with serious, long-term consequences. It may also be referred to as 'female genital cutting,' 'circumcision,' or 'initiation.'

Any other staff member who discovers that FGM appears to have been performed on a pupil under 18 must inform the DSL and proceed according to Section A.

Any staff member who suspects a pupil is at risk of FGM or suspects FGM has occurred must speak to the DSL and observe local safeguarding protocols.

## **SECTION E: Concerns Related to Radicalisation, Extremism, or Terrorist Activity**

Initially, follow the procedures set out in Sections A and B. The Department for Education provides a dedicated helpline (020 7340 7264) for school staff and governors to report concerns regarding pupil extremism. Alternatively, concerns can be emailed to [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk).

In emergencies, contact 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- believe any person is in immediate danger;
- suspect someone is planning to travel to join an extremist group;
- observe or hear anything potentially related to terrorism.

If any further or new information comes to light when a prevent referral is being assessed, this must be passed on to the police.



## Appendix 2: Recording and Storing Data

### Record Keeping

Pupil protection and safeguarding records will be maintained using CPOMS.

All safeguarding concerns, related discussions, decisions, and the rationale for those decisions must be documented in writing. If there is uncertainty regarding whether to record specific information, staff should consult with the DSL for guidance.

Records shall include:

- A clear and comprehensive summary of each concern.
- Details outline how the concern was addressed and resolved.
- Documentation of actions taken, decisions made, and outcome.
- A dedicated child protection file for each child.

Non-confidential records will remain readily accessible. Confidential documentation will be stored securely and made available only to individuals with a legitimate or professional need to access them.

Safeguarding records pertaining to individual children will be retained for an appropriate period following their departure from the school.

When a pupil with current or previous safeguarding concerns transfers to another institution, the DSL will ensure their child protection file is transferred promptly, securely, and separately from the main pupil file. Electronic transfer via CPOMS will be utilised.

To facilitate support for the child upon arrival at the new school or college, files should be transferred within:

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

For cases involving significant or complex concerns, or where social services are involved, the DSL will directly communicate with the receiving school's DSL to provide pertinent information, allowing for necessary preparations to safeguard the child.

Where staff, volunteers, agency personnel, or visitors have a concern, it must be recorded on a paper form and submitted to the DSL for inclusion in CPOMS. The DSL will enter details from the written record and scan it into the pupil's CPOMS file.

## **Appendix 3: Recruitment and Selection Process**

To recruit individuals appropriately, all staff involved in recruitment and employment for positions working with children will be required to complete relevant safer recruitment training.

### **Application Forms**

Application forms will include a statement indicating that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity with children, when applicable.

### **Shortlisting**

The shortlisting process will:

- review any inconsistencies, identify gaps in employment, and examine provided reasons.
- assess potential concerns.
- Include a public online check.

Shortlisted candidates will be requested to complete a self-declaration of their criminal record or any information that may make them unsuitable to work with children, allowing for discussion during the interview stage.

The requested information will include:

- Criminal history.
- Inclusion on the barred list.
- Prohibition from teaching.
- Criminal offences committed in any country in accordance with laws applicable in England and Wales.
- Any relevant overseas information.

Candidates will also sign a declaration confirming the accuracy of the information provided.

An online search will be conducted on shortlisted candidates to identify publicly available incidents or issues. Candidates will be notified that these checks are part of the standard due diligence process.

### **Seeking References and Checking Employment History**

References will be obtained before interviews, where possible, with any concerns addressed with referees and discussed with the candidate during the interview.

Reference procedures will:

- not accept open references.
- involve direct communication with referees and verification of reference information.
- ensure references originate from the candidate's current employer and are completed by a senior individual. If the referee is school-based, confirmation from the headteacher regarding disciplinary investigation accuracy will be sought.
- verify the most recent relevant period of employment if the candidate is not currently

employed.

- obtain a reference from the last employer where the candidate worked with children if they are not currently doing so.
- compare application form details with reference information, resolving any inconsistencies with the candidate.
- address and resolve all concerns prior to appointment confirmation.

## **Interview and Selection**

During interviews, the following will occur:

- Inquiry into gaps in employment or frequent changes in employment/location, requesting candidates to provide explanations.
- Examination of potential areas of concern to assess suitability for work with children.
- Documentation of all the information considered and decisions made.

## **Pre-appointment Vetting Checks**

All details regarding vetting procedures are recorded in the school's single central record (SCR), and relevant documentation is stored in individual personnel files. Procedures adhere to statutory requirements and best practices for document retention as outlined below.

## **New Staff**

Employment offers are subject to satisfactory completion of all necessary preemployment checks. When recruiting new staff, the following steps will be taken:

- Identity verification.
- Obtaining an enhanced DBS certificate via the applicant, including barred list information for those engaged in regulated activity (see definition below). The certificate will be obtained before or as soon as practicable after appointment, using the DBS update service if applicable. Copies of the certificate will not be retained for more than six months, though records of the check, its outcome, and the recruitment decision may be kept.
- Conducting a separate barred list checks if work in regulated activity commences prior to receipt of the DBS certificate.
- Verifying mental and physical fitness to undertake job responsibilities.
- Checking the right to work in the UK, with verification retained for the duration of employment and two years afterward.
- Confirming professional qualifications where relevant.
- Ensuring teachers are not subject to a prohibition order.
- For management positions, candidates must not be subject to a section 128 prohibition from management direction issued by the Secretary of State.
- Conducting additional checks for candidates who have lived or worked outside the UK, as appropriate. These may include:
  - Criminal record checks for overseas applicants for all staff, including teaching positions.
  - For teaching roles: obtaining confirmation from the relevant professional authority in the foreign country that no sanctions or restrictions have been

imposed, and there is no reason to consider the individual unsuitable to teach

**Regulated Activity** refers to individuals who:

- regularly teach, train, instruct, care for, or supervise children in a school or college.
- perform paid or unsupervised unpaid work regularly in settings where such work provides potential contact with children.
- provide intimate or personal care, or participate in overnight activities, even on a one-time basis and regardless of supervision.

### **Existing Staff**

Relevant checks may be conducted for existing staff under certain circumstances, treating them as new staff members, such as when:

- concerns arise regarding their suitability to work with children.
- individuals transfer from a non-regulated to a regulated activity role.
- there is a break in service of twelve weeks or longer.

Referrals to the DBS will be made for anyone considered to have harmed or posed a risk of harm to a child or vulnerable adult, where:

- there is belief the individual has engaged in relevant conduct.
- they have received a caution or conviction for an offence specified under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.
- the 'harm test' is met (i.e., the individual may harm or place a child or vulnerable adult at risk).
- the individual is removed or would have been removed from regulated activity (paid or unpaid) had they not left.

### **Agency and Third-party Staff**

Written notification will be obtained from any agency or third-party organisation confirming completion of the required safer recruitment checks equivalent to those conducted by the school. Identity verification of the individual presenting for work will also be undertaken to ensure consistency with the completed checks.

### **Contractors**

Arrangements will be made to ensure that contractors or their employees working at the school have received an appropriate level of DBS check if unsupervised, as follows:

- Enhanced DBS check with barred list information for contractors involved in regulated activity.
- Enhanced DBS check (excluding barred list information) for other contractors not engaged in regulated activity but whose work involves regular contact with children.

Contractors without these checks will not be permitted to work unsupervised or participate in regulated activity. The identity of all contractors and their employees will be verified upon arrival at the school.

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## **Trainee/Pupil Teachers**

For salaried applicants for initial teacher training, all necessary checks will be carried out directly by the school. For fee-funded trainee teachers, written confirmation from the training provider will be obtained verifying that all required checks have been completed and the trainee has been deemed suitable to work with children.

## **Volunteers**

Unchecked volunteers will not be left unsupervised. An enhanced DBS check with barred list information will be obtained for all volunteers new to regulated activity.

## **Governors**

All governors will receive an enhanced DBS check with barred list information. This check will also apply if a governor is involved in regulated activity. All governors are subject to a section 128 check, as a section 128 direction disqualifies an individual from holding a position as a maintained school governor. The chair of the board's DBS check will be countersigned by the Secretary of State.

All proprietors, trustees, local governors, and members will undergo the following checks:

- Section 128 check (to assess prohibition under section 128 of the Education and Skills Act 2008).
- Identity verification.
- Right to work in the UK.
- Additional relevant checks if they have lived or worked outside the UK.

## **Staff Working in Alternative Provision Settings**

When a pupil is placed with an alternative provision provider, we require written assurance from the provider confirming that they have conducted the necessary safeguarding checks on all individuals working there, in accordance with the standards we would apply ourselves. And the DSL or headteacher will visit the provision to ensure its suitability and its safeguarding culture.

## **Adults Who Supervise Pupils on Work Experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity. We will also visit that workplace setting to ensure its suitability for the pupil and that appropriate safeguarding, health and safety, risk assessment, supervision and reporting arrangements are in place to protect children from harm.

## Appendix 4 – Designated Leads

|                                                                                                                 |                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>New Ways School</b><br><b>300 Redhill Road</b><br><b>Kings Norton</b><br><b>Birmingham</b><br><b>B38 9EL</b> | <b>Corbett House</b><br><b>Westonhall Road</b><br><b>Stoke Prior</b><br><b>Bromsgrove</b><br><b>B60 4AL</b> |
|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|

|                                      |                                                                                |                                |
|--------------------------------------|--------------------------------------------------------------------------------|--------------------------------|
| Keys Designated Officers:            | James Madine<br>(Chair of Governors)                                           | 07773 474 876                  |
|                                      | Julie Hamilton<br>(Safeguarding Governor/Director)                             | 07789 996 850                  |
| Designated Safeguarding Lead         | Louise Reeks                                                                   | 01527 958686                   |
| Deputy Designated Safeguarding Leads | Violet Watson<br>(New Ways School site)<br>Vicky Jones<br>(Corbett House site) | 07974 256 233<br>07519 327 253 |
| Mental Health Lead                   | Anna Pickering<br>(New Ways School site)<br>Mary Hood<br>(Corbett House site)  | 07394 871 931<br>07355 627 207 |
| Prevent Lead                         | Louise Reeks                                                                   | 01527 958686                   |

### Responsibilities of Safeguarding Champions include:

- Ensuring Keys full compliance with the standards set by the Local Safeguarding Children Partnership (LSCP) for managing allegations, as stipulated in Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026. This includes integrating LSCP procedures into Keys policies and practices.
- Guaranteeing that all staff members are informed of, and adhere to, protocols concerning allegations against adults working with or on behalf of children.
- Establishing robust systems within Keys to review cases, identify areas for improvement, and implement changes that enhance procedures and practices.

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- Addressing and resolving any inter-agency challenges that may hinder the effective application of LSCP procedures.
- Ensuring that the designated roles are accurately incorporated within Keys policies and procedures.
- Maintaining effective arrangements for reporting and record-keeping across Keys.

## Appendix 5: Reporting and Referring Contact Information

### Concerns Relating to the Safeguarding of Children

Children Protection / Safeguarding Concerns – Not Involving Allegations Against Staff.

All safeguarding concerns must be reported immediately to the designated contact at the local authority where the school is located. For this school the host local authority is Birmingham. For out-of-hours situations, please notify the Emergency Duty Team (EDT).

The placing authority responsible for the affected child or children must also be informed. In out-of-hours cases, contact should be made with EDT.

For serious safeguarding incidents please escalate concerns using the Serious Incident Policy (HS/POL/045) available on Radar.

|                                                              |                                         |
|--------------------------------------------------------------|-----------------------------------------|
| Host Local Authority Children's Safeguarding Lead(s)name(s): | Birmingham                              |
| Safeguarding Team Telephone contact:                         | 0121 303 1888 (Option 2, then Option 2) |
| Safeguarding Team email contact:                             | educationsafeguarding@birmingham.gov.uk |
| Safeguarding Team Out of Hours Duty Desk contact number:     | 0121 675 4806                           |

### Allegations and Concerns Against Staff

All allegations involving a member of staff must be reported to the Local Safeguarding Children's Partnership Designated Person, specifically, the LADO (Local Authority Designated Officer). The name and contact information for your area's LADO are provided below.

In addition, the placing authority responsible for the child or children involved must be informed. If outside normal working hours, please notify the Emergency Duty Team (EDT).

For serious safeguarding incidents please escalate concerns using the Serious Incident Policy (HS/POL/045) available on Radar.

|                       |                                                          |
|-----------------------|----------------------------------------------------------|
| Local Authority Name  | Birmingham                                               |
| LADO name:            | Duty LADO on call                                        |
| LADO Contact Details: | 0121 675 1669<br>ladoteam@birminghamchildrenstrust.co.uk |

## Appendix 6 – Contextual Safeguarding Information and Location Risk Assessment

### New Ways School site

New Ways School is situated in Kings Norton, just outside Birmingham city centre. Kings Norton is on a commuter belt and is well served by public transport, including direct rail links into Birmingham and bus services to Solihull, Northfield and Longbridge. Canal towpaths provide routes towards Birmingham and Stratford. These transport links create an immediate opportunity for pupils to leave the area if they abscond.

The local area has a range of retailers and a steady footfall of visitors. A busy main road is situated next to the school, so pupils require appropriate supervision during unstructured times.

New Ways School serves pupils from a broad geographical area, including Birmingham, Sandwell, Solihull, Worcester, Tamworth and Sutton Coldfield. The school's proximity to large urban areas may expose vulnerable pupils to risks including grooming, child sexual exploitation, county lines and radicalisation.

#### Local bus routes and stops nearby:

Routes 45, 48 and 49.

#### Local train stations and stops nearby:

Northfield and Longbridge.

#### Any known destinations if children abscond:

Historically, pupils have entered the local housing estate or surrounding fields. There are no other known destinations close to either site.

#### Any information about known gangs or groups operating around the school and potential disputes arising:

There are several gangs in and around Birmingham, although none have been identified as operating within Kings Norton. The school considers potential gang association during the referral and risk-assessment process, including the risk of bringing pupils connected to rival groups together.

#### Any criminality hot spots in the area:

Local shops and Northfield shopping centre are known targets for shoplifting. Pupils only visit these locations with accompanying staff.

#### Any known drug hot spots in the area:

Birmingham New Street station is identified as a location where adults under the influence may occupy the entrances. The school avoids using this station and uses local stations where possible.

#### Any physical risks present in the school environment:

Two drains in the rear passageway require covers. This is recorded on the site action plan and will be monitored until resolved.

### **Corbett House site**

Corbett House is situated in Stoke Prior, south of Bromsgrove. It is close to the A448 and A38, with access to Bromsgrove, Worcester and Birmingham International Airport.

### **Local bus routes and stops nearby:**

Diamond Bus route 141 travels through the village between Bromsgrove and Worcester. The stop is at the end of Westonhall Road, by the industrial estate.

### **Local train stations and stops nearby:**

Bromsgrove railway station is approximately 2.5 miles away in Bromsgrove town centre.

### **Any known destinations if children abscond:**

The site is beside a busy road, with a residential estate on one side and an office block on the other. The road changes from a 30 mph limit to the national speed limit shortly after the entrance. There is also a canal and overgrown woodland in the village, which must be considered if a pupil absconds.

### **Any information about known gangs or groups operating around the school and potential disputes arising:**

The Worcestershire GET SAFE strategy identifies a rise in children associating with local street gangs. Reported activity includes antisocial behaviour, theft, carrying weapons, bullying and violence towards vulnerable people. The school will continue to use current local intelligence and partnership information when assessing risk.

### **Any criminality hot spots in the area:**

Bromsgrove, Redditch and Worcester are identified as local hot spots and are accessible by bus from Stoke Prior.

### **Any known drug hot spots in the area:**

The locations listed above are considered as part of individual risk assessment and supervision planning.

### **Any physical risks present in the school environment:**

No unresolved site risks are recorded in the source policy. Internal and external risks are monitored daily.

### **Any other intelligence shared by professionals that affects the safeguarding of pupils at the school:**

None currently recorded.

## Appendix 7: Safeguarding Oversight and Information for Display

**The Designated Safeguarding Lead (DSL) is the primary safeguarding officer for the school. Any additional staff trained to this level serve as deputies and provide cover in the DSL's absence.**

It is essential that the DSL demonstrates comprehensive oversight of all safeguarding incidents occurring within the school. The DSL is responsible for being fully informed about every referral and for ensuring that all concerns are appropriately addressed and followed up.

Schools must provide a dedicated staff noticeboard and one or more pupil-friendly noticeboard(s), each clearly labelled and not used for any unrelated information.

Each noticeboard should include:

- The names and roles of the DSL, Deputy DSL(s), and mental health leads. Only one individual may serve as the lead DSL.
- Contact details for senior leaders overseeing safeguarding, including the safeguarding governor.
- Contact information for designated local authority safeguarding contacts, as well as details for Ofsted, the police, and Childline (for pupils).
- A copy of the school's safeguarding policy and any appendices.
- The latest version of KCSIE 2026.
- Information identifying relevant key policies such as:
  - Whistleblowing Policy
  - Grievance Policy

### Safeguarding Training

All new staff members receive safeguarding training as part of their induction process.

All staff participate in face-to-face safeguarding refresher training on an annual basis.

In addition, staff are required to complete mandatory online safeguarding modules covering:

- Female Genital Mutilation (FGM)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Child-on-Child Abuse
- Neglect
- Honour-Based Abuse and Forced Marriage
- Serious Youth Violence
- Sexual Violence and Harassment
- Online Abuse and Internet Safety

### The Prevent Duty

Completion of the Prevent Duty training course is mandatory for all staff members.

## Appendix 8: - Checklist for Staff and Governors

This checklist outlines essential responsibilities, protocols, and statutory references derived from the safeguarding policy. It is intended for use during staff induction and as part of ongoing refresher training.

### Statutory References

- Ensure familiarity with 'Keeping Children Safe in Education (KCSIE) 2026'.
- Adhere to 'Working Together to Safeguard Children (2026)'.
- Understand obligations under the Children Act 1989 and 2004.
- Be cognisant of the Prevent Duty as stipulated by the Counterterrorism and Security Act 2015.
- Comply with the Equality Act 2010 and the Human Rights Act 1998.
- Have knowledge of the Independent School Standards (Part 3).

### Roles and Responsibilities

- All staff are required to read all of Part One of KCSIE, annually and provide a signed declaration of comprehension.
- The Designated Safeguarding Lead (DSL) must be a senior member of the leadership team, responsible for overseeing all aspects of safeguarding and child protection.
- Deputy DSLs are to support the DSL and act on their behalf when necessary.
- Governors are expected to appoint a Designated Safeguarding Lead and oversee full implementation of safeguarding policies.
- The headteacher is responsible for ensuring staff receive appropriate training and that safeguarding policies are effectively communicated to parents and carers.
- The education director serves as an alternate DSL if required.
- Staff are to ensure that no pupil or staff member has a mobile phone on in school, and visitors should be advised to have their mobile phone on silent or turned off, and not to use in areas that pupils are in.

### Safeguarding Procedures

- All concerns must be promptly reported to the DSL or Deputy DSL.
- Safeguarding concerns should be recorded using CPOMS.
- Immediate referral to children's social care or the police is required if a child is at risk of harm.
- Follow established procedures for disclosures, FGM, extremism, and mental health issues.
- Adhere to guidance on managing low-level concerns and allegations.
- Conduct contextual safeguarding risk assessments as required.

### Child-on-Child Abuse and Online Safety

- Proactively challenge inappropriate behaviour and language among pupils.
- Deliver education to pupils regarding consent, healthy relationships, and report any incidents of sexual harassment, violence, or sexting directly to the DSL.

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- Maintain effective filtering and monitoring systems for online safety.
- Support both victims and alleged perpetrators through comprehensive risk assessments and intervention plans.

### **SEND and Vulnerable Pupils**

- Offer additional pastoral support and assign key workers for pupils with SEND.
- Remain vigilant to barriers to disclosure and indicators of abuse within vulnerable groups.
- Implement tailored safeguarding adaptations in RSHE and tutorial programmes.
- Our school is committed to supporting gender questioning children. We recognise the importance of creating a safe and inclusive environment where all children feel respected and supported. Staff will receive training on how to support gender questioning children, ensuring that their needs are met, and they feel safe within the school community.

### **Training and Monitoring**

- Complete mandatory induction and annual safeguarding training.
- Undertake Prevent awareness training as required.
- Governors must participate in safeguarding training upon induction and at regular intervals thereafter.
- The DSL and deputies are required to complete Level 3 safeguarding training biennially.

Review and update the safeguarding policy and associated procedures annually.

## Appendix 9: School Specific Mental Health Guidance

New Ways School recognises that mental health concerns may quickly become safeguarding concerns and puts the following plans in place.

Staff receive training on how to remain alert to indicators such as children or young people displaying any of the following:

- Self-injurious behaviour
- Suicidal thoughts (ideation)
- Hopelessness
- Withdrawal
- Sleep difficulties
- Eating difficulties
- Significant behavioural change
- Risk taking behaviour (including use of drugs and/or alcohol)

The link people on site for any concerns regarding the above are:

- Anna Pickering (New Ways School site)
- Mary Hood (Corbett House site)

The mental health first aiders at the school are:

- Anna Pickering (New Ways School site)
- Mary Hood (Corbett House site)

Keys also have specialist advisors who have specific areas of expertise. These are:

- Self-injurious behaviour/suicide prevention – Helen Stewart
- Substance Misuse – Fran Gracie
- Harmful Sexualised Behaviour – Gayle Bradbury
- Criminal exploitation – Katie Proudman
- Police Liaison – Steve Challinor

The Keys Education Clinical Team provide support in a number of areas related to mental health support including hopelessness, withdrawal, suicidal thoughts, sleep difficulties, behaviour change and other needs relating to low mood.

The clinical team for New Ways School is:

EP - Emma Martin

Assistant EP - Molly Hands

### Immediate Risk

Where a child is at immediate risk during the school day (and in school's care):

- emergency services will be contacted;

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- parents/carers will be informed (unless for any reason it is deemed unsafe to do in consultation with regional director/education director, so in which case social care contact will be made);
- the DSL and headteacher will be informed immediately;
- urgent medical intervention will be sought where appropriate.

Where a child is at immediate risk (outside school hours):

- emergency services will be contacted (if not already aware);
- parent/carers will be informed immediately (if not already aware);
- social care will be contacted and appropriate support for family sought immediately.

### **School-based mental health interventions**

In line with KCSIE 2026, any mental health support provided by the school will be evidence-based, appropriate, safe and regularly reviewed.

All interventions provided by New Ways School come from the pre-planned therapeutic curriculum strand in partnership with Keys Education Clinical Team. New Ways School takes part in regular multi-disciplinary meetings and clinical reviews to ensure that ongoing support meets the above criteria.

## Appendix 10: Pupil Safety Plan (Template)

| Safety Plan for ***** |                                                                           |
|-----------------------|---------------------------------------------------------------------------|
| Types of Risk         | <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul> |

Why is the safety plan in place:

*Example: My name is [pupil name]. I am struggling with [needs and general risk, for example, my mental health/my This is my safety plan. I need you to read this plan and understand the best way to support me at school, especially when I am struggling.*

My History - Include a brief overview of the contextual safeguarding history that the pupil feels comfortable with you sharing, below is an example:

*Example: I have experienced a lot of **school-based trauma** including being the victim of an assault by a teacher when I was very young, multiple placement breakdowns, and **rejections** from staff and peers. As a result of this, **I find it hard to trust people.***

How I see the world – this might impact what I do or say: Include some key bullet points around that support the pupil's understanding of the world around them.

Example:

- *I have a strong sense of justice. I need to understand why decisions have been made not just about me, but about other people.*
- *[example] I am loyal to my friends and safe people, so I find it hard not to get involved if something involves them.*

What would I like adults to know about me? Work with the child to include 2 or 3 key points here, that they think are really important to know about this risk and how it impacts them.

Example

- *I don't like over reactions or under reactions.*
- *I use negative behaviour to get access to safe people instead of asking.*
- *I feel embarrassed when I've hurt someone. Even if you don't think I do.*

Early signs that I am not doing okay: Work with the child to identify some keep indicators that their risk level is increasing

Example

- *I start tapping my feet or my hands a lot and start pacing around.*

|                                                                        |
|------------------------------------------------------------------------|
| My 2,3,4 Safety Plan                                                   |
| <b>TWO</b> places I feel safe that I can go to, or you can take me to: |
| 1.                                                                     |
| 2.                                                                     |

|                                                    |
|----------------------------------------------------|
| <b>THREE</b> things that can people do to help me: |
| 1.                                                 |
| 2.                                                 |
| 3.                                                 |

|                                                                                      |  |
|--------------------------------------------------------------------------------------|--|
| <b>FOUR</b> people that I trust, who you can get or call on the phone to support me: |  |
| 1.                                                                                   |  |
| 2.                                                                                   |  |
| 3.                                                                                   |  |
| 4.                                                                                   |  |

## Appendix 12 – Types of Abuse

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

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

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

Emotional abuse may involve:

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

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

The activities may involve:

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

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

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

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

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

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



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## **Appendix 13 – Specific Safeguarding Issues**

### **Children Who Are Absent from Education**

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at nonstandard transition points.

Where a Pupil has been absent with no notification to the school, then a Safe and Welfare check to the home will be carried out, by a member of staff no later than 5 days from first recording of non-attendance, for the staff member to physically see the pupil is safe.

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

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

### **Child Criminal Exploitation and County Lines**

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

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

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

Indicators of CCE can include a child:

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

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

## **Child Sexual Exploitation**

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

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

## **Child Trafficking**

Trafficking is where children and young people tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for:

- Sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic slavery like cleaning, cooking and childcare
- Forced labour in factories or agriculture
- Committing crimes (e.g. begging, theft, working on cannabis farms or moving drugs)

Trafficked children experience many types of abuse and neglect. Traffickers use physical, sexual and emotional abuse as a form of control. Children and young people are also likely to be physically and emotionally neglected and may be sexually exploited.

Knowing the signs of trafficking can help give a voice to children. Sometimes children won't understand that what's happening to them is wrong. Or they might be scared to speak out.

It may not be obvious that a child has been trafficked but you might notice unusual or unexpected things. They might:

- spend a lot of time doing household chores.
- rarely leave their house or have no time for playing.
- be orphaned or living apart from their family.
- live in low-standard accommodation.
- be unsure which country, city or town they're in.
- can't or are reluctant to share personal information or where they live.
- not be registered with a school or a GP practice.
- have no access to their parents or guardians.
- be seen in inappropriate places like brothels or factories.
- have money or things you wouldn't expect them to have.

## **Child-on-Child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:  
bullying (including cyber-bullying, prejudice-based and discriminatory bullying).

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

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

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

## **Grooming**

Grooming is a process that "involves the offender building a relationship with a child, and sometimes with their wider family, gaining their trust and a position of power over the child, in preparation for abuse." (CEOP, 2022)

Grooming can happen anywhere, including:

- Online
- In organisations
- In public spaces (also known as street grooming)

(McAlinden, 2012).

Children and young people can be groomed by a stranger or by someone they know – such as a family member, friend or professional. The age gap between a child and their groomer can be relatively small (NSPCC and O2, 2016).

Grooming techniques can be used to prepare children for sexual abuse, exploitation or radicalisation.

### **Recognising that a child is being groomed**

It's rare for a child to tell an adult about being groomed.

Children may not feel able to seek help because they:

- are unaware that they're being groomed.
- believe they are in a caring relationship and are worried about jeopardising it.
- are scared of what the groomer will do if they speak out.
- don't want to get the groomer in trouble.
- blame themselves for getting involved in the relationship.
- are ashamed or worried about sharing what's happened to them with other people.

If a child does speak out, you should reassure them that they've done the right thing in telling you, and that what's happening to them is not their fault.

Which signs should I look out for?

Professionals should be aware of and able to recognise signs that a child may be being groomed.

Signs a child is being groomed include:

- Sudden changes in behaviour, such as spending more or less time online.
- Spending more time away or going missing from home or school.
- Being secretive about how they're spending their time, including when using online devices.
- Having unexplained gifts, big or small.
- Misusing alcohol and/or drugs.
- Having a friendship or relationship with a much older person.
- Developing sexual health problems.
- Using sexual language you wouldn't expect them to know.
- Seeming upset or withdrawn.
- Mental health problems.

(Rigg and Phippen, 2016, Metropolitan Police, 2022).

### **Domestic Abuse**

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the Designated Safeguarding Lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass. The headteacher has received the training for Operation Encompass and West Yorkshire Police are a part of OE too.

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **Private Fostering**

#### **Definition and Scope**

- Private fostering: when a child under 16 (or under 18 if disabled) is cared for and accommodated by someone who is not a parent, person with parental responsibility, or a close relative for 28 days or more.
- Close relatives are defined as parents, grandparents, brothers, sisters, uncles, aunts, or step-parents (e.g. teenagers living with friends' families, children sent from abroad for education, or young people staying with host families during holidays).

#### **Legal Duties and Notification**

- Parents, carers, or anyone involved in making the arrangement must notify the local authority ideally before the arrangement starts, or immediately in an emergency.
- The local authority has a duty to assess the suitability of the carer, visit the home, and check the welfare of the child.

#### **Staff Responsibilities and Procedures**

Staff should be aware of how to spot signs of a hidden or unannounced private fostering arrangement and report immediately to the Designated Safeguarding Lead.

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### **‘Honour-Based’ Abuse (including FGM and Forced Marriage)**

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

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

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

### **FGM**

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/pupil already being known to social services in relation to other safeguarding issues.

A girl:

- having difficulty walking, sitting or standing, or looking uncomfortable.
- finding it hard to sit still for long periods of time (where this was not a problem previously).
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- having frequent urinary, menstrual or stomach problems.
- avoiding physical exercise or missing PE.
- being repeatedly absent from school, or absent for a prolonged period.
- demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- being reluctant to undergo any medical examinations.
- asking for help, but not being explicit about the problem.
- talking about pain or discomfort between her legs.

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

- The girl’s family having a history of practicing FGM (this is the biggest risk factor to consider).
- FGM being known to be practiced in the girl’s community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- having a mother, older sibling or cousin who has undergone FGM.
- having limited level of integration within UK society.

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

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

### **Forced Marriage**

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

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

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

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

The DSL will:

- speak to the pupil about the concerns in a secure and private place.
- activate the local safeguarding procedures and refer the case to the local authority’s designated officer.
- seek advice from the Forced Marriage Unit on 020 7008 0151 [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)
- refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

### **Preventing Radicalisation**

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Terrorism** is an action that causes one or more of the following to occur:

- Danger of, or actual serious violence to a person/people.
- Serious damage to property.
- Serious interference or disruption to an electronic system.

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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

Staff should **always** act if they are worried.

## **Sexual Violence and Sexual Harassment Between Children in Schools**

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

- challenging inappropriate behaviours.
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalizing them.

## **Serious Violence**

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

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

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

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

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

## **Non-recent abuse**

Non-recent abuse (also known as historic abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone.

This can be either:

- someone who is an adult (18 years or over) and the allegation relates to an incident that took place when the alleged victim was under 18 years old, or
- someone who is still a child (under 18 years) and the allegation relates to an incident that took place when the alleged victim was a younger child.

If staff have any concerns about non-recent abuse, their response must be of as high a standard as a response to current abuse. It is also imperative to ascertain if the alleged perpetrator has current access to children or vulnerable persons.

## **Contextual Safeguarding**

Contextual safeguarding is the process of understanding and responding to risks and vulnerabilities that children may encounter in their wider lives. The school recognises that safeguarding concerns can arise in peer relationships, within the community, at school, and online, and that these contexts can significantly

influence a child's safety, behaviour, and wellbeing. The school is committed to identifying and addressing such risks through early intervention, partnership working, and a child-centred approach. The school will provide as much information as possible to children's social care (and if appropriate, the police) as part of any referral undertaken.

### **Children with Family Members in Prison**

The school understands that children who have members of their family in prison are statistically more likely to underachieve and fail to reach their potential than their peers and may require specific services and support.

Families and children of people in prison will be seen as families first and school will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison.

### **Checking the identity and suitability of visitors**

**All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.**

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors must sign the visitors' book and wear a visitor's badge.

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

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

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

### **Missing Pupils**

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

- follow on foot (or car), where possible, attempt to keep 'eyes on' and encourage their return to school.
- alert school staff immediately the pupil goes missing from an out of school activity.
- immediately send staff to the last known location.
- alert parents/carers.

- attempt to contact the child via mobile where possible.
- if the pupil isn't found within an agreed time with parents, a collective decision will be made to report the child missing to the police.

### **On and Off-Site Supervision**

When the school place a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and for ensuring quality assurance visits of the provision are completed. The school will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of our own staff. We will also ensure that the alternative provision provider is aware of any risk factors or safeguarding concerns for any pupil placed with them by us and that they can meet their needs. In respect of us being responsible for the safeguarding of that pupil we will establish agreements and protocols with the alternative provision provider for the sharing of information such as daily attendance or emerging concerns, are established and adhered to.

Keys believes that pupils can derive immense educational benefit by taking part in off-site visits. The knowledge and experience gained beyond the classroom can consolidate and extend the taught curriculum within it. Taking part in problem solving, decision-making experiences both at home and abroad can enhance the development of personal and social skills. An off-site visit is defined as pupils going 'beyond the school gates' to pursue an activity organised by the school. Activities may take place during or after the school day, at weekends or in school holidays. Please refer to the Educational Visits Policy.

Staff supervision will be in place in line with the pupil's risk assessment while pupils attend all educational activities.