



Wilson's School

Safeguarding and Child Protection Policy and Procedure

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A.	SAFEGUARDING AND CHILD PROTECTION POLICY	
1.	Introductory Statement: "The welfare of the child is paramount"	3
2.	Definition	5
3.	Recognition	5
3.1	Attendance and Children Missing Education (CME)	6
3.2	Child Sexual Exploitation (CSE)	7
3.3	Child Criminal Exploitation (CCE)	8
3.4	Domestic Abuse	9
3.5	Female Genital Mutilation (FGM)	10
3.6	'Honour-Based' Abuse (HBA)	11
3.7	Online safety	12
3.8	Child on child abuse (including Sexual Violence and Sexual Harassment)	14
3.9	The 'Prevent Duty'	17
4.	Designated Staff	17
5.	The role of individual staff	18
6.	Confidentiality of records	19
7.	Working with children	19
7.1	Mental health and possible links to safeguarding and child protection	19
7.2	Children who have a social worker	19
7.3	Children who are lesbian, gay, bisexual or gender questioning (LGBT)	19
8.	Recruitment, selection, training and supervision of staff and volunteers	21
9.	Training	22
10.	Education off-site	23
11.	Work experience	24
12.	Contractors and outside services	24
13.	Visiting speakers	24
B.	CHILD PROTECTION PROCEDURES	25
14.	How to approach a conversation with a pupil where you have a concern about their safety or wellbeing	25
15.	The Referral process	25
16.	Contact with the family	27
17.	Private fostering	27
18.	Record Keeping	28
19.	Concern about a staff member, carer, volunteer or contractor	29
19.1	Allegations	29
19.2	Low-level Concerns	29
20.	Harm from, or harm to, other children	31
21.	Radicalisation	31
22.	Requests for assistance by other agencies	33
23.	Pupils subject to a Child Protection (CP) Plan	33
24.	Escalation	33
25.	Whistleblowing	34
C.	CONTACT DETAILS	35
	APPENDIX 1 - SAFEGUARDING PROCEDURE RELATING TO ADULT VISITORS	36

A. SAFEGUARDING AND CHILD PROTECTION POLICY

This policy must be read in conjunction with the latest version of Keeping Children Safe in Education <https://www.gov.uk/government/publications/keeping-children-safe-in-education>)

1. Introductory Statement: "The welfare of the child is paramount"

At Wilson's School the safety and welfare of our pupils is of the utmost importance. Because of the day-to-day contact with children, adults in the school are well placed to observe signs of abuse. All adults working at Wilson's School must be aware that any pupil may be at risk of harm, abuse or exploitation. We have a duty to safeguard and promote the welfare of our pupils (as indicated by a range of legislation outlined in Annex B of Keeping Children Safe in Education) by identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate. We are committed to safeguarding the children and young people in our care and expect everyone who works at Wilson's School to share this commitment, acting always in the best interests of the child.

In addition to our Safeguarding and Child Protection Policy, we have policies to cover the roles of staff, pupils and parents in respect of health and safety, anti-bullying, racism and discrimination. We also have a Staff Conduct Policy and a Whistleblowing Policy.

We ensure that issues of safeguarding and child protection (including online safety) are explored with students through the Personal, Social and Health Education (PSHE) curriculum. Children are taught, in an age-appropriate way, to recognise when they are at risk, how to keep themselves safe and how to get help when they need it, for instance through the use of case studies and examples of how problems for children were resolved by seeking help from school staff, using the school's online anonymous 'Report a Concern' tool or using recommended helplines. We are sensitive to the specific needs and vulnerabilities of individual children, including those who are victims of abuse and those with special educational needs or disabilities.

This policy applies to all staff, trustees and volunteers working in the school and parents are informed about this and our other policies on the school's website, with attention drawn to specific elements of the policy at times during the year.

We monitor and evaluate the policy throughout the year in a range of ways, including through the regular review of referrals made to the Designated Safeguarding Lead in our DSLs meeting, via external scrutiny and support (e.g. from the Education Safeguarding Lead at Cognus) and in termly meetings between the DSL and the trustee responsible for safeguarding and child protection. The DSL also has a timetabled supervision meeting with the Executive Head.

There are a number of elements to our policy:

- ensuring safer recruitment practice in checking the suitability of all our staff and volunteers to work with children; raising awareness of child protection issues

amongst all staff and volunteers and making sure they know that they should share these with the DSL.

- It should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL
- developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- developing effective links with relevant agencies and co-operating as required with their enquiries regarding child protection matters, including attendance at case conferences and core group meetings
- establishing and maintaining a safe environment in which children feel secure and are encouraged to talk freely about anything that concerns them
- ensuring that children know there are adults in the school who they can approach if they are worried about anything
- including opportunities in the PSHE curriculum to develop and equip pupils with the skills needed to recognise risks (including online safety risks) and stay safe from abuse
- supporting pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan
- ensuring we respond appropriately to any concern or allegation about a member of staff or volunteer
- ensuring staff follow accepted “safe practice” principles when working with students (in particular the Staff Conduct Policy, the Behaviour Code of Conduct, DfE Advice on Use of Reasonable Force, and the safeguarding response to children missing education). These policies must be covered during the induction of new staff at the school.

If there are Child Protection concerns the London Child Protection Procedures (<http://www.londoncp.co.uk/>), must be followed. The Sutton Local Safeguarding Children Partnership (LSCP) has adopted these procedures. This policy and procedure also accord with:

- “Keeping Children Safe in Education” (2025) and
- “Working Together to Safeguard Children” (2023).

If lower-level concerns or needs (i.e. not child protection) are identified about a particular pupil, the Sutton LSCP Threshold guidance should be followed.

In all decision-making, the school takes into account the 2010 Equality Act and the Public Sector Equality Duty (PSED).

The school also assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.

2. Definition

Safeguarding and promoting the welfare of pupils relates to any child or young person (i.e. under 18 years of age) and is defined as:

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

3. Recognition

The first indication of concern about a pupil's welfare is not necessarily the presence of a serious injury. Concerns may arise because of:

- bruises or marks on a pupil's body
- remarks made by the pupil, another pupil, a parent or another adult
- observations of the pupil's behaviour, particularly changes in behaviour or behaviour that is out of character
- unexplained changes in the pupil's behaviour or personality
- evidence of disturbance or explicit detail about abuse or possible abuse in a pupil's writing or drawing
- evidence of neglect, failure to thrive or exposure to unnecessary risks
- unauthorised absence from school
- information about the parent(s) / carer(s) of the child or their home background
- signs of a pupil being drawn into anti-social or criminal behaviour, including gang
- involvement and association with organised crime groups including 'county lines', or pupils having large amounts of money
- misuse of technology e.g. sexting, inappropriate comments online, cyber bullying and online grooming

Children and young people with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- these children can be disproportionately impacted by behaviours like bullying without outwardly showing any signs; and
- there may be communication barriers and difficulties in managing or reporting these challenges

Further details of the pastoral support and attention provided for these children can be found in the school's Special Educational Needs and Disabilities policy.

Staff at the school are expected to be familiar with the definitions and indicators of the four kinds of abuse and neglect as stated in paragraphs 24 – 28 and in Part 1 Annex B of Keeping Children Safe in Education (2025). Staff should be particularly mindful that harm can include ill treatment which is not physical, including the impact of witnessing ill treatment of others (for example, the impact of witnessing any form of domestic abuse).

3.1 Attendance and Children Missing Education (CME)

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation, including involvement in 'county lines'. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that relevant staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Knowing where children are during school hours is an extremely important aspect of safeguarding. We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date emergency contact numbers for parents/carers. Parents are regularly reminded to update contact details and this can be done online via Arbor.

In response to the guidance in Keeping Children Safe in Education (2025) the school has:

1. Staff who understand what to do when children do not attend regularly, particularly where this is a repeated issue
2. Appropriate policies, procedures and responses for pupils who go missing from education
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - i) leave school to be home educated
 - ii) move away from the school's location
 - iii) remain medically unfit beyond compulsory school age
 - iv) are in custody for four months or more (and will not return to school afterwards);or
 - v) are permanently excluded

To ensure no child falls into the category of Children Missing Education, we will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. Every effort will be made to contact the child's family and establish if they are now on the roll of another school and the details of that school.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date and contact the new school to confirm they have joined the school roll.

3.2 Child Sexual Exploitation (CSE)

The definition of CSE can be found in the Department for Education's Child Sexual Exploitation:

Definition and a guide for practitioners (2017):

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

Indicators of child sexual exploitation may include a range of behaviours and Harmful Sexual Behaviours, including:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);

- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

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

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Keeping Children Safe in Education (2025) contains further guidance around the contextual circumstances in which CSE can take place.

3.3 *Child Criminal Exploitation (CCE)*

The definition of Child Criminal Exploitation (CCE) can be found in Keeping Children Safe in Education (2025):

CCE occurs where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into any criminal activity, (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. CCE can affect all children and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact, it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

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

Some additional specific indicators that may be present where a child is criminally exploited through involvement in ‘county lines’ are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing

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

3.4 Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Wilson's School participates in Operation Encompass, an early intervention safeguarding information sharing partnership between the police and schools to identify pupils who may be in need of support as early as possible. Where police have attended an incident of domestic abuse and a child was present, notification of this incident will be shared with the school prior to the start of the next school day. This enables the necessary pastoral support to be provided straight away where appropriate.

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

The National Domestic Abuse helpline can be called free of charge and in confidence 24 hours a day on 0808 2000 247.

3.5 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

As set out in the Serious Crime Act 2015, teachers have a specific legal duty to act with regards to concerns about FGM; whilst all staff should speak to the Designated Safeguarding Lead (or Deputies / Assistants) regarding any concerns about FGM, teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. Such disclosures could come from a male pupil at the school about his sister or other relative or concerns may arise as a result of unusually timed requests to travel to parts of the world where FGM is prevalent.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indicators that FGM may have taken place include the following:

- have difficulty walking, sitting or standing and may even look uncomfortable
- spend longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- be particularly reluctant to undergo normal medical examinations
- confiding in a professional without being explicit about the problem
- talking about pain or discomfort between her legs

How to report FGM to the Police

The government provides clear guidance on the next steps which should be taken when an act of FGM is discovered or suspected. This can be found at - [Mandatory reporting of female genital mutilation: procedural information \(accessible version\)](https://www.gov.uk/government/guidance/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version) - GOV.UK (www.gov.uk)

This guidance includes the following instructions:

- It is recommended that you make a single report orally by calling 101, the single non- emergency number
- Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.
- Reports under the FGM duty should be made to the police as soon as possible after a case is discovered.

The duty does not apply in relation to at risk or suspected cases.

3.6 So-called 'Honour-Based' Abuse (HBA)

School staff must also be vigilant about forced marriage, gender-based violence and so-called honour-based abuse, which encompasses crimes which have been committed to protect or defend the honour of the family and/or the community. This includes FGM and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where a member of staff is concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 and means that 16 and 17 year olds are no longer allowed to marry or enter into a civil partnership, even if they have parental consent. Any concerns that pupils may be arranging to enter in either union or have already done so should be referred immediately to the DSL.

3.7 Online safety

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and financial scams

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. However, many pupils are able to access the internet using their own data plan and no one system is guaranteed to protect children. To minimise inappropriate use, pupils in Years 7-11 may only use mobile devices with permission and under the supervision of an adult in the school. In addition, pupils in Year 7 and 8 may not bring internet enabled devices onto the school premises.

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. The safeguarding team complete regular checks using the LGfL (London Grid for Learning) software. Any actions are recorded. Monitoring can include:

- Physical monitoring
- Live software monitoring
- Monitoring user logs
- Monitoring individual devices

The effectiveness of the monitoring and filtering is reviewed in the timetabled DSL meetings and during SLT and Trust scrutiny of the process.

Our Designated Safeguarding Lead, a member of SLT, our IT team and a trustee review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring and know how to share their concerns.

All staff take part in annual cybersecurity training.

There are very rare cases when a pupil is unable physically to attend school but is fully able to learn. For example, a pupil may be recovering from an operation, or from injuries where physical attendance might inhibit recovery. In such circumstances, where prolonged isolation at home is required as a result of an official specialist medical diagnosis, the school will provide remote education in the form of resources, such as textbooks / workbooks, as well as teacher guidance and assessment via e.g. email and phone calls.

In the event that access to school buildings is restricted for a large number of pupils over an extended period of time, live online teaching will be provided, following the usual timetable and using a suitable platform (e.g. Google Classroom). If a child does not have digital or online access at home, the school will ensure that resources are provided to enable them to access live online teaching.

If, for whatever reason, a pupil is unable to attend school over a period of time, members of staff responsible for the child's pastoral care will stay closely in touch to safeguard their welfare and ensure their educational progress. These communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online

Guidance about online learning can be found in the Guidance for Safer Working Practices (February 2022) [Professional and Personnel Relationships \(saferrecruitmentconsortium.org\)](https://www.saferrecruitmentconsortium.org/)

Pupils and parents are given specific information on online safety elements in the broader curriculum and PSHE (which are constantly evolving in response to changes in technology). They are taught how to recognise when they are at risk online (such as a stranger being insistent on meeting in person or receiving inappropriate sexual content) and how to get help when they need it. They are pointed towards the support of the relevant pastoral staff, including their Head of Year, or the Designated Safeguarding Lead. They are also signposted towards the support of relevant external agencies, including CEOP, the police's Child Exploitation Online Protection centre.

We recognise that pupils need exposure to new and emerging technologies and the digital world to reap a wide range of both educational and social benefits. We ensure that PSHE and the broader curriculum talk positively about healthy and safe use of the internet and technology, as well as educating pupils about the risks they may face.

3.8 *Child-on-child abuse (including Sexual Violence and Sexual Harassment)*

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school as well as online. At Wilson's we recognise that, even if there are no reports of child-on-child abuse from pupils, this does not mean that it is not happening. We also recognise that addressing inappropriate behaviour, even if it appears to be relatively innocuous, is an important intervention that helps prevent problematic, abusive, violent and/or harmful sexual behaviour (HSB) in the future. We have a culture of zero- tolerance towards all forms of child-on-child abuse, including sexual violence and sexual harassment.

It is known to be more likely that girls will be victims and boys perpetrators, but all child on-child abuse is unacceptable and will be taken seriously: abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh", "boys being boys" or "part of growing up". All staff must challenge inappropriate behaviours such as those listed below and report any concerns regarding child on child abuse to the Designated Safeguarding Lead or Deputies / Assistants.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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);
- Harmful Sexual Behaviours (HSB), which may include:
 - 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).

The school seeks to minimise the risk of child-on-child abuse by ensuring that pupils learn about healthy and respectful relationships, what respectful behaviour looks like, stereotyping, the concept of consent and the characteristics of abusive or prejudiced relationships between young people as part of their PSHE curriculum. They are taught that sexual violence and sexual harassment is always wrong and that harmful sexual behaviours should be challenged. Pupils are told often about the different channels open to them to make disclosures about their own safety and the welfare of other pupils, including the anonymous 'Report a Concern' facility on the school's website, key members of the pastoral and safeguarding teams who they may speak to and information about external agencies (such as Childline) who can provide support.

We recognise that some pupils may feel hesitant to report what has happened to them due to uncertainty about what may happen next. As a result, we have produced two 'What Happens Next' documents which are shared with pupils online – one explaining what may happen next if they use the 'Report a Concern' online tool and another explaining what may happen next if they report an instance of sexual violence, sexual harassment or other form of harmful sexual behaviour.

Victims, alleged perpetrators and any other child affected by child on child abuse or Harmful Sexual Behaviours will be supported in accordance with Paragraphs 467 and 491 of Keeping Children Safe in Education (2025), acknowledging that the needs and wishes of the victim should be paramount and that the victim should never be made to feel they are the problem for making a report, have their experience minimised or be made to feel ashamed for making a report. It is imperative that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that has occurred online or outside of school will not be downplayed and will be treated equally seriously as abuse that may have occurred within school.

Allegations of child-on-child abuse and concerns about Harmful Sexual Behaviours will be recorded, investigated and dealt with in accordance with Part 5 of Keeping Children Safe in Education (2025), with particular regard to the searching, screening and confiscation advice for schools where there is an online element to the abuse. Where there has been a report of sexual violence, and in some cases of reports of sexual harassment, the Designated Safeguarding Lead will conduct a risk assessment to consider:

- the risk to and needs of the victim, especially their protection and support
- whether there may have been other victims
- the risk to and needs of the alleged perpetrator(s); and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

- the time and location of the incident, and any action required to make the location safer.

Children's Social Care and other specialist services (including the Police and/or an NHS Sexual Assault Referral Centre) will be engaged as required. In cases where nude or semi-nude images have been shared, we follow guidance given to schools by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (March 2024). This guidance was updated to include images created by artificial intelligence (AI).

Staff taking a report from a pupil about child-on-child abuse must never promise confidentiality. The school will, however, only involve staff and external agencies who are required to support that pupil or conduct any element of investigation. Where a pupil has been the victim of sexual harassment or sexual assault and requests anonymity, or asks for the school not to make any further referrals, the Designated Safeguarding Lead will follow the guidance provided in part five of Keeping Children Safe in Education (2025) to determine the appropriate next steps.

Victims and alleged perpetrators will continue to receive support after the initial allegation and investigation, and the need and wishes of the victim will be considered as paramount alongside their ongoing protection. They will be supported both by pastoral staff at the school and with the assistance of any of the following agencies as appropriate:

- Early help and children's social care Children and Young People's Independent Sexual Violence Advisors (ChISVAs) who provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools to ensure the best possible outcomes for the victim. Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and adolescent mental health services
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and

support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.

- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

In any instance of child-on-child abuse, the school's child protection procedures will be adhered to for both the victim and the alleged perpetrator; it is recognised that all parties concerned will require ongoing support and need to be protected from any further harm, including the potential for bullying.

In addition, we recognise the importance of understanding intra-familial harms. Where siblings have been affected by incidents of sexual violence or sexual harassment, any necessary support will be arranged for them from the list stated above.

3.9 The 'Prevent Duty'

Please see the section on Radicalisation in the Child Protection Procedures below.

4. Designated Staff

The Designated Safeguarding Lead (DSL) and his Deputies and Assistants are most likely to have a complete safeguarding picture and will be the most appropriate individuals to advise on any safeguarding concerns. Our Designated Safeguarding Lead is **Gavin Englefield** and the Deputy Designated Safeguarding Leads are: **David Alderson and Edward McLaughlin**. The Assistant Designated Safeguarding Leads are: Eleanor Golland, Sam Pearson-Brown and Gloria Ironside. They are responsible for safeguarding and child protection issues. Any member of staff concerned about a pupil should tell the Designated Safeguarding Lead (or his Deputies or one of the Assistants) immediately. We also have a nominated trustee for child protection who is **Liz Nash**. Her deputy is **Julian Pearcey**. Concerns about the Executive Head should be brought to the attention of **John Nicholson**, the Chair of the Trust Board.

The DSL has a responsibility to:

- liaise with the nominated trustee, the local authority Education and Children and Family Services, Police and other agencies on individual child protection cases, providing information about wider environmental factors affecting a child's life that may pose a threat to their safety and/or welfare (contextual safeguarding);
- act as the contact person within the school, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the Trust Board) are aware of their role;
- manage referrals from school staff or any others from outside the school;
- work with external agencies and professionals on matters of safety and safeguarding;

- be responsible for co-ordinating action within the school on child protection issues, including the development of relevant action plans;
- discuss individual cases with staff on a “need to know basis” in order to protect children's right to confidentiality;
- oversee the planning of any curricular or other provision in relation to child protection matters;
- with any other relevant staff (e.g. class teacher or Head of Year), represent the school at child protection meetings and be a member of a “Core Group” if required;
- take the lead with early help procedures where these might be appropriate for a child;
- ensure staff are familiar with this Policy and Procedure, Keeping Children Safe in Education (2025) and any emerging child protection or safeguarding issues that may affect pupils at the school;
- raise awareness about child protection and safeguarding on an on-going basis;
- ensure that child protection training for all (i.e. including ancillary) staff is regularly updated;
- ensure that they (the Designated Safeguarding Lead and their Deputies or Assistants) maintain up-to- date training and that each of them attends the Sutton Secondary Designated Safeguarding Lead meetings at least once each term;
- maintain a strong awareness of the local context, including familiarity with OFSTED reports relating to safeguarding and children’s services in local boroughs.
- ensure that child protection information is transferred to the pupil’s new school.
- be aware of pupils who have a social worker;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with relevant teachers and school leadership staff;
- ensure that child protection information is transferred if a pupil moves to a new school
- work with the Virtual school head appointed by the local authority to promote the education and welfare of any Looked After Children and those who have a social worker.
- work with others to ensure that the school’s filtering and monitoring systems are functional and effective.

5. The role of individual staff

Everyone in the school must be alert to the possibility that any pupil, regardless of race, religion, culture, class or family background, could be the victim of abuse, neglect or exploitation and must be familiar with these procedures. Staff should be mindful that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected. They may also not recognise their experience as harmful. Concern about a pupil must be discussed with the Designated Safeguarding Lead immediately so that, if necessary, a referral can be made without delay. In urgent situations, referral must not be delayed. Verbal conversations should be promptly recorded in writing.

Members of staff should not investigate child protection concerns. This is done by Children's Social Services or the Police. However, if a pupil says something, it is vital to listen carefully, so you can record and report it accurately. Records will also assist other members of staff in seeking the appropriate support for the pupil, including via external services where appropriate.

6. Confidentiality of records

Our pupils and their parents have the right to expect that all staff will deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Our safeguarding record system (CPOMS) can only be accessed by pastoral leaders and SLT. Parents and, where appropriate, pupils should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a young person. Child protection issues relating to individual cases must never be subject to open discussion in the staff room or elsewhere in the school.

Members of staff should also remember not to promise to pupils to keep "secrets" (*see Child Protection procedures below*).

7. Working with children

We recognise that young people who are abused, exploited or neglected, or who witness these things, may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- the content of the curriculum
- the school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued
- the school Behaviour Code of Conduct which is aimed at supporting vulnerable pupils in the school; the school will ensure the pupil knows that some behaviour is unacceptable but that they are valued and not blamed for any abuse which has occurred
- liaison with other agencies that support the child such as social care, the Child and Adolescent Mental Health Service (CAMHS), the borough school attendance service and the educational psychology service
- ensuring that, where a pupil with a child protection plan leaves the school their information is transferred to any new establishment immediately "ensuring secure transit and confirmation of receipt" (Keeping Children Safe in Education 2024) and that the social worker is informed

The school takes account of the advice given for practitioners in: "Information sharing advice for safeguarding practitioners" (DfE May 2024)

7.1 Mental health and possible links to safeguarding and child protection

All staff at Wilson's School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Members of staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead (or Deputies or Assistants). The school's Senior Mental Health Lead is Gavin Englefield.

7.2 Children who have a social worker

When a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker, including by ensuring more personalised support from the Head of Year and/or Pupil Support Manager.

7.3 Children who are lesbian, gay, bisexual or gender questioning (LGBT)

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, we should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children*, when deciding how to proceed.

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

*NB This is under review by the Government. Revised guidance on gender questioning children is expected soon..

8. Recruitment, selection, training and supervision of staff and volunteers

In our recruitment and selection of staff and volunteers we will at all times adhere to the guidance contained within "Keeping Children Safe in Education" (2025) and "Working Together to Safeguard Children" (2023). All reasonable steps will be taken to establish whether an applicant is subject to a teacher prohibition order and, if so, prevent their employment.

"Keeping Children Safe in Education" (2025) sets out the required checks:

Most staff in a school and those in colleges working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children's barred list information, will be required. In summary, a person will be engaging in regulated activity with children if, as a result of their work, they:

- *will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;*
- *will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or*
- *engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.*

In particular we will ensure that at least one interview panellist is appropriately trained in safer recruitment, that we always follow up gaps in previous employment, that we always require specific references -where possible from employers -in order to obtain objective and factual information to support appointment decisions and that for all posts, paid and voluntary, the appropriate Disclosure and Barring Service checks are conducted. All those applying for posts at the school must complete a standard application form prior to appointment.

We keep a central record of all adults with the date and outcome of their DBS check so that, at all times, staff, pupils and parents can be assured this has been done. DBS checks are redone every five years at the school.

The guidance in Keeping Children Safe in Education Part Four (2025) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

9. Training

The induction of new staff in the school always involves safeguarding training, including details about the role of Designated Safeguarding Lead. The staff handbook contains this policy and other relevant policies (including Acceptable Use, Whistleblowing, Staff Conduct, and Pupil Code of Conduct). All staff have access via [2. SAFEGUARDING](#) on SharePoint to a range of other guidance and procedures, including “What to do if you’re worried a child is being abused: advice for practitioners” (2015).

Those working at the school in a full time, permanent capacity would expect to receive training in child protection and safeguarding matters at least twice per year (one full training session in September and another focussing on a specific, relevant safeguarding issue). Training emphasises that safeguarding is not just about protecting children from deliberate harm, but also includes issues such as pupils’ health and safety; filtering and monitoring; bullying/cyberbullying; racist, homophobic, transphobic, and sexist abuse; harassment and discrimination; use of physical intervention; meeting the needs of pupils with medical conditions; drug and substance misuse; educational visits; e-safety; issues which may be specific to a local area or population, e.g. gang activity and school security. These members of staff are required to complete an online check that confirms their knowledge of Keeping Children Safe in Education (2025) and ascertains that they would be able to put their training into practice effectively. They will also receive child protection and safeguarding updates, including email bulletins, during the course of the school year.

After appropriate initial induction, contractors, volunteers, temporary staff and those who work irregularly or infrequently in the school (or who are not in frequent contact with children) receive a briefing sheet (which reflects Part 1 of “Keeping Children Safe in Education”) on an annual basis. The training record indicates what training in any other form that they receive.

Training includes information about additions to the most recent versions of Keeping Children Safe in Education:

- All staff should understand, that even if there are no reports in their schools or colleges, it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the Designated Safeguarding Lead (or Deputies or Assistants).
- It is essential that all staff understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- All staff should be aware that children may not feel ready or know how to tell someone they are being abused/exploited/neglected and they may not recognise their experiences as harmful

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and Deputies and Assistants) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse) criminal exploitation, serious youth violence, county lines and radicalisation.

Staff who teach PSHE are provided with additional guidance, training and support in tackling the sensitive subjects they are required to deliver within the curriculum, including the statutory requirements of Relationships and Sex Education (RSE).

Training also includes information about our 'Local Context':

- Rates of Domestic Abuse are higher in some local boroughs (e.g. Croydon, Sutton) than elsewhere in the UK. We are very alert to the higher risk that our pupils might observe or be subject to abuse in the home.
- Children in London boroughs can be targeted for criminal exploitation (e.g. 'County Lines', where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns).

The Designated Safeguarding Lead and Deputies attend formal training every half term provided by Sutton LSCP which keeps their knowledge and skills constantly refreshed and provides valuable insight into safeguarding priorities in our local context.

Members of the Trust Board of the school take part in mandatory training to enable them to assure themselves that the safeguarding policies and procedures in place in the school are effective. This training is regularly updated. They also complete an annual online check to confirm their understanding of Keeping Children Safe in Education (2025).

10. Education off-site

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

We will, at all times, adhere to the statutory guidance contained within Alternative Provision (February 2025) Education for children with health needs who cannot attend school (December 2023).

11. Work experience

The school should ensure that any work experience placement provider has policies and procedures in place to protect children from harm.

DBS checks may be required for supervisors of pre-16 work experience:

Paragraph 336 of Keeping Children Safe in Education (2025) states: "Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The school or college should consider the specific circumstances of the work experience. Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary."

DBS checks are not required for supervisors of post-16 work experience:

Paragraph 339 says: "Schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience"

12. Contractors and outside services

We expect all contractors providing services within the School and whose staff have access to school premises to comply with this policy. This expectation must form part of the contract. In particular we require any contractor or organisation delivering a service on behalf of the school to confirm that they adhere to the above requirements in terms of recruitment, selection, training and supervision of their staff and any volunteers, in particular DBS checks are conducted. Checks are usually only required if a contractor's member of staff will be left unsupervised.

Any organisation using school facilities must comply with the law and government guidance relating to child protection and this is a condition of letting. However, the school may refer any concerns they have about the provider to the local authority.

13. Visiting speakers

Visiting speakers are arranged as part of routine assemblies, Activities Days and talks and lectures. These are usually coordinated by senior members of staff. Visiting speakers must be approved by a member of the senior leadership team.

Although not always possible, it is preferable to invite speakers from an established company, charity or other group whose aims are well-documented (for example Speakers for Schools). The speaker will be expected to talk with staff about the content of the presentation before the event; speakers and staff must allow time for this discussion, whether it is on the day or beforehand.

B. CHILD PROTECTION PROCEDURES

If concern arises about the welfare of a pupil the following procedure must be followed.

Do not delay:

- Tell the Designated Safeguarding Lead as soon as you can - it may be necessary to interrupt a lesson to do this - do not leave notes in the Designated Safeguarding Lead's pigeonhole as they may not get back to check their post until the end of the day once the child has gone home.
- Early referral, using the WELFARE CONCERN FORM, gives more time to offer help to the pupil and family before the situation becomes severe or serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult the Children's Social Care in the relevant area.

Make written notes:

- At the earliest opportunity make a written record of your concerns – use the child's own words as far as possible and record facts accurately and be clear when you are expressing an opinion and the basis for this - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated.
- All notes must be given to the Designated Safeguarding Lead as soon as possible.

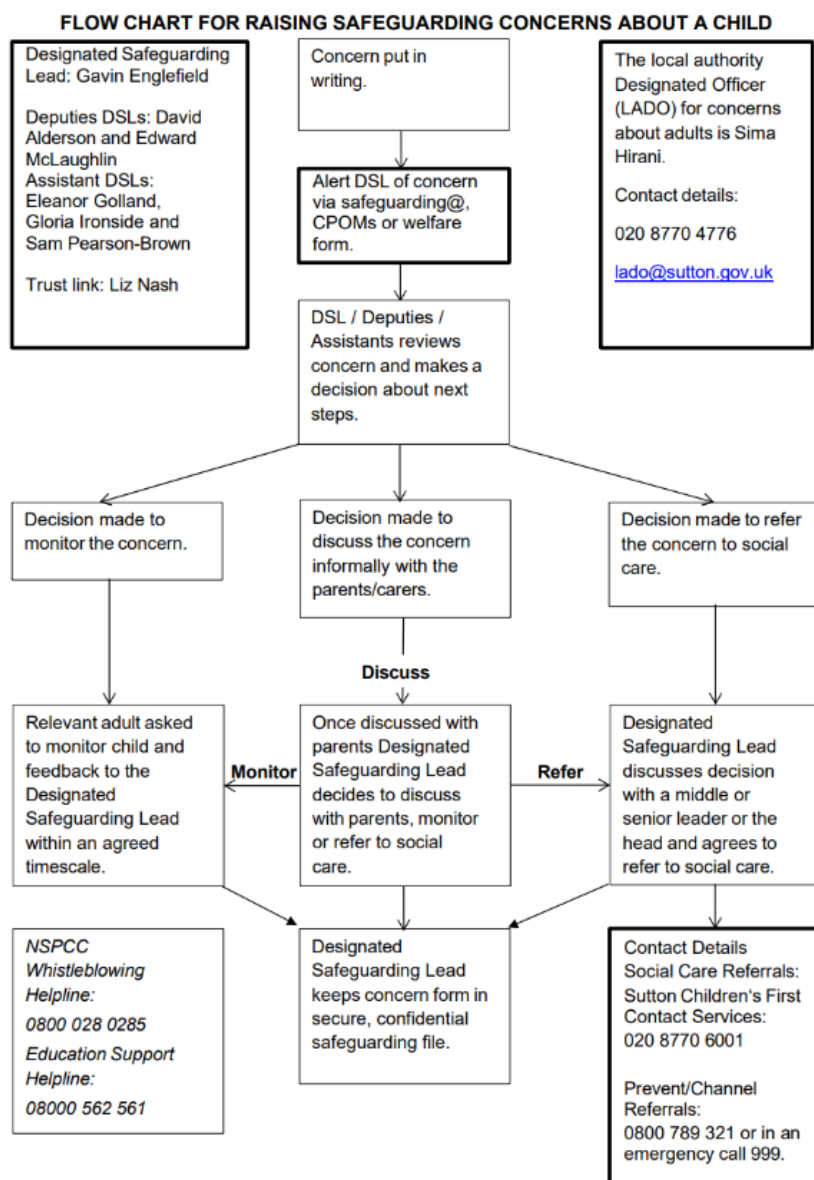
14. How to approach a conversation with a pupil where you have a concern about their safety or wellbeing

- **Listen** - do not ask leading questions or interrogate. Do ask questions of clarification. Consider interpreting services if English is a second language. Consider using a signer or communication aid if student has special needs.
- **Remain calm** - if you are shocked, upset or angry the pupil will sense this and this could stop them from saying more.
- **Reassure** - the pupil has done nothing wrong - tell them it is alright to talk.
- **Do not promise to keep it secret** - tell the pupil you cannot keep the matter secret and will need to take advice from someone who can help.

15. The Referral process

The WELFARE CONCERN FORM should be used to record any issues or concerns. This should be passed promptly to the Designated Safeguarding Lead by email (to safeguarding@wilsonsschool.sutton.sch.uk) or on paper. An attempt should be made to find the Designated Safeguarding Lead in person to let him know that the form has been completed, and where concerns are urgent staff must not rely on email communication alone.

If the DSL or one of his Deputies or Assistants is not available, members of staff should speak to a member of SLT and/or take advice from children's social care.



If a member of staff wishes to make a referral to Social Care or to the Police, they should consult the Designated Safeguarding Lead or deputies about how to do this. However, referral must not be delayed (see below). The Children's First Contact Service (CFCS) will be happy to discuss concerns even if you are not sure at that stage whether a referral needs to be made.

Staff may also choose to consult the document: When to call the police produced by the National Police Chiefs Council (NPCC).

Sometimes, it will be more appropriate to use an assessment framework other than the CFCS referral form, for example: Early Help Referral, FGM, CSE, or CME.

Individual staff may make a direct referral to social services.

In exceptional circumstances, such as in emergency or where there is a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care in the borough in which the child lives. A senior member of staff must be made aware that this referral has been made.

In summary:

- if in doubt, consult
- do not ignore concerns, even if these are vague. Trust your instincts.
- your first responsibility is to the pupil – always consider what is in the best interests of the child.
- if you need help or support to manage your own feelings, this can be provided

16. Contact with the family

Contact with the family should be discussed with the Designated Safeguarding Lead, who may consult Sutton CFCS or the Children's Services department in the borough in which the child lives. In cases where a minor physical injury causes concern, it is usual school practice to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the pupil from harm), the pupil (as appropriate), parent or carer should be informed that the matter must be referred to the Children and Family Social Work Service.

In cases of possible neglect or emotional abuse, the concern may have built up over a period of time. There may have been discussion previously between school staff and the family about sources of help but if concerns persist, the Designated Safeguarding Lead will need to refer to CFCS and will normally advise the family of this.

In cases where there are suspicions of sexual abuse, the Designated Safeguarding Lead will seek immediate advice from the Children and Family Social Work Service before discussing this with the family.

17. Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered

children are affected by abuse and neglect, may be at risk of Harmful Sexual Behaviours themselves and may be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

18. Record Keeping

All records relating to child welfare concerns will be kept securely (CPOMS). The record will indicate clearly what action has been taken.

Records of any concerns about pupils must be kept even where there is no need to refer the matter immediately.

Information from records will only be accessed by staff on a "need to know" basis, for example when a pupil is subject to a Child Protection Plan the Head of Year and form tutor will usually be asked to monitor the pupil's welfare on a daily basis.

Records relating to the pupil's welfare will be maintained as long as the pupil is a pupil at the school. When the pupil leaves the school, the new school will be advised in writing that the school's records contain information about child protection concerns even where these are no longer current. Records should be sent to the new school or FE College in a way that is lawful in terms of the requirements of the Data Protection Act and GDPR.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

19. Concern about a staff member, carer, volunteer or contractor

At Wilson's we recognise the possibility that adults working in the school may harm children, including trustees, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Executive Head without delay; any concerns about the Executive Head should be brought to the attention of John Nicholson, Chair of the Trust Board. He can be contacted via the Clerk to the Trust Board – clerk@wilsonsschool.sutton.sch.uk

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

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

19.1 Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO by the Executive Head 'without delay'.

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

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

19.2 Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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

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

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

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

Low-level concerns will be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

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

Records will be kept confidential, held securely and comply with the Data Protection Act 2018. They will be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a review identifies wider cultural issues within the school which enabled the behaviour to occur, appropriate remedial action will be taken to reduce the risk of reoccurrence e.g. by updating school policies or providing extra training.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO by the Executive Head.

- Clear instruction is provided to all school staff in the Staff Conduct Policy, which includes references to staff/pupil relationship and communications (including the use of social media).
- It is important to bear in mind that although the concern may relate to an individual pupil other pupils may also be at risk;
- If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

20. Harm from, or harm to, other children

Child on child abuse is now covered specifically in Part 5 of Keeping Children Safe in Education (2025) and concerns about abuse or harm by other young people should be subject to the same safeguarding procedures as in respect of young people being abused by an adult.

Professionals responding should be alert to the risk a child may pose to children other than any “current” victim; and young people who harm others are likely to have considerable needs themselves (e.g. they may have been subjected to abuse, witnessed domestic abuse or committed criminal offences). In such cases there will usually be a need to refer the alleged perpetrator of harm to the CFCS or Children’s Services in the borough in which they live.

21. Radicalisation

The Counter Terrorism and Security Act 2015 “places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers ... to have due regard to the need to prevent people from being drawn into terrorism”. This has become known as the ‘Prevent Duty’.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views.

There are a number of behaviours which may indicate a child is at risk of being radicalised or exposed to extreme views. These include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality
- spending increasing time in the company of other suspected extremists,
- changing their style of dress or personal appearance to accord with the group
- day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.
- Graffiti, art work or writing that displays extremist themes
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- secretive behaviour
- possession of materials or symbols associated with an extremist cause
- attempts to recruit others to the group/cause or impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- communications with others that suggests identification with a group, cause or ideology
- using insulting derogatory names for another group
- online searches or sharing extremist messages or social media profiles
- increase in prejudice-related incidents committed by that person, which may include: physical or verbal assault, provocative behaviour, damage to property, derogatory name calling, possession of prejudice-related materials, prejudice related ridicule or name calling, inappropriate forms of address, refusal to co-operate, attempts to

recruit to prejudice- related organisations, or condoning or supporting violence towards others

It is important for us to be vigilant and remain fully informed about radicalisation and extremism issues. Members of staff are reminded to suspend any 'professional disbelief' that instances of radicalisation 'could not happen here'. Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, referring the matter to the Designated Safeguarding Lead (or Deputies or Assistants) who may need to make a Prevent referral.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

The school is able to filter and monitor online activity that may be linked to radicalisation or extremism.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

NB This is under review by the Government and may change in due course.

22. Requests for assistance by other agencies

School staff have a legal duty to assist local authority Children's Social Care or the Police when they are making enquiries about the welfare of pupils. Information about a pupil must therefore be shared on a "need to know" basis with other agencies.

When telephone requests for information are received, **always** maintain security by checking the telephone number listing for the caller and calling back to a switchboard number **before** giving information or confirming the pupil is on the school roll.

Always advise the Designated Safeguarding Lead about such requests for information. Requests for attendance at meetings about individual pupils (e.g. child protection conferences) should be notified to the Designated Safeguarding Lead, who will arrange preparation of a report and attendance at the meeting.

Reports should contain information about the child's:

- academic progress
- attendance
- behaviour
- relationships with children and adults
- family

- any other relevant matter

Reports should be objective, distinguishing between fact, observation, allegation and opinion. Unless you specify otherwise, reports will normally be made available to the pupil's family.

23. Pupils subject to a Child Protection (CP) Plan

The school will be told by the relevant local authority Children's Services department when a pupil is subject to a Child Protection Plan (previously the Child Protection Register) whether by the London Borough of Sutton or another local authority.

The name of the key social worker must be clearly recorded on the pupil's record. The school will participate fully in the work of Core Groups for these pupils to assist with the objectives of the Child Protection Plan for the pupil.

When a pupil is subject to a Child Protection Plan, the school will report all unexplained absences even if only of a day. When a pupil is subject to a Child Protection Plan, the school will report all behavioural changes or other concerns to the key social worker. When a pupil who is subject to a Child Protection Plan leaves the school, all the child protection information will be transferred to any new school.

24. Escalation

Occasionally situations arise when workers within one agency feel that the decisions made by a worker from another agency on a child protection or child in need case is not a safe decision.

In these circumstances, resolution should be sought within the shortest timescale possible to ensure that the child is protected. Some disagreements regarding safeguarding decisions will require speedy resolution. In all cases where a professional believes a child to be at imminent risk of harm and another agency disagrees, they should refer direct to Sutton Local Safeguarding Children Partnership after consulting with their line manager or named Child Protection Advisor. Where a matter is still unresolved, consideration will be given to referring the matter to the LSCP Chair and appropriate members of the LSCP informed in order to seek multi-agency resolution.

25. Whistleblowing

Within the school, staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Under these circumstances, staff should consult the school's Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached.

- there has been a miscarriage of justice.
- the health and safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed'

The NSPCC also runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

C. CONTACT DETAILS

Welfare concerns should be sent to: safeguarding@wilsonsschool.sutton.sch.uk

- Gavin Englefield, Designated Safeguarding Lead:
ge@wilsonsschool.sutton.sch.uk
- David Alderson, Deputy Designated Safeguarding Lead:
dma@wilsonsschool.sutton.sch.uk
- Edward McLaughlin, Deputy Designated Safeguarding Lead:
egm@wilsonsschool.sutton.sch.uk
- Eleanor Golland, Assistant Designated Safeguarding Lead:
EJG.wilsonsschool.sutton.sch.uk
- Sam Pearson-Brown, Assistant Designated Safeguarding Lead:
SSB@wilsonsschool.sutton.sch.uk
- Gloria Ironside, Assistant Designated Safeguarding Lead:
GI@wilsonsschool.sutton.sch.uk

If the DSL or one of the Deputies or Assistants is not available, members of staff should speak to a member of SLT and/or take advice from children's social care.

Concerns about the behaviour of adults (staff, volunteers and contractors) should be shared with the Executive Head, Nathan Cole or the Associate Head, Tim Lissimore. They can be contacted via his PA, Hazel Ware – hw@wilsonsschool.sutton.sch.uk

Concerns about the behaviour of the Executive Head should be shared with the Chair of the Trust Board, John Nicholson. He can be contacted via the Clerk to the Trust Board – clerk@wilsonsschool.sutton.sch.uk

Sutton Children's First Contact Service: 020 8770 6001 (referrals and advice).

Sutton Children and Families Emergency Duty Social Work Team: 020 8770 5000 (Extension: 9, ask for a Duty Social Worker)

Local Authority Designated Officer (LADO): 020 8770 4776 (for any allegations against staff)
lado@sutton.gov.uk

OFSTED contact centre: 0300 123 1231

NSPCC Croydon helpline: 020 8253 1850

NSPCC whistleblowing helpline: 0808 800 5000 or email help@nspcc.org.uk

National Domestic Abuse helpline: 0808 2000 247

APPENDIX 1 - SAFEGUARDING PROCEDURE RELATING TO ADULT VISITORS

All employees must follow this procedure if they invite or receive visitors over the age of 18 who are not current members of the school (or parents of current pupils). This includes Old Wilsonians (even recent Old Wilsonians), family members, friends and former colleagues. This procedure also applies to adults who participate in or accompany school trips.

Summary

If your visitor will not have planned access to children and will be accompanied by a member of staff at all times during the visit, a risk assessment does not need to be completed, they must just sign in and sign out at Reception, and wear a Visitor's Badge. Please make sure the Administration Team is informed by completing this form: [Visitors to School Site](#).

If your visitor will not have planned access to children but will not be accompanied by you or a member of staff at all times, the Visitor's Form must be completed, and a risk assessment must be completed and signed by the Executive Head. You must speak to Mr Englefield in advance of the visit.

If your visitor will have planned and supervised access to children (i.e. accompanied by a member of staff at all times), you need to fill in the Visitor's Form. If your visitor is going to be in the school on a regular basis, consideration should be given to whether the additional safeguarding procedure outlined below would be appropriate and they should be given a briefing by the Designated Safeguarding Lead.

If your visitor will have unsupervised access to children, an additional safeguarding procedure must take place (they must possess a DBS Certificate and must be entered on the SCR in advance and a risk assessment must be completed and signed by the Executive Head). This must take place before the visit commences. You are advised to speak to Mr Englefield. Any visitor who will have unsupervised access to children **must** receive child protection training from the Designated Safeguarding Lead or their nominated alternative.

Ofsted inspectors do not need to be entered on the SCR in advance and no risk assessment needs to take place. OFSTED Inspectors carry their official ID badges and these should be checked. Where there are concerns over identity, schools can contact Ofsted's National Business Unit on 0300 123 4234.

Aim

The aim of the procedure is not to limit activities in which visitors to the school should be engaged, but rather to ensure that the safeguarding implications of such visits have been carefully thought through.

Clearly most of the people we invite to the school are people we know and trust. We should continue to make them welcome. They will understand the need for procedures to keep children safe.

The sad experiences which have led to a heightening of awareness regarding safeguarding show that those who wish to harm children can be very devious and creative in the means by which they gain access to children. The first thing they will do is test how rigorous the school is in limiting access to students. If they find that they can enter and walk around the school without challenge, then the school is putting children at risk. Therefore we need to know who each and every adult is in the school at any time and to have considered the implications of their visit for children's safety.