




<b>South Cumbria Pupil Referral Service</b>	 <b>SOUTH CUMBRIA</b> PUPIL REFERRAL SERVICE
<b>CHILD PROTECTION POLICY</b>	ISSUE 19 DATE: September 2025

<b>RECORD OF ISSUE</b>			
ISSUE	DATE	NEXT REVIEW	SUMMARY
1	Sept 2007	Sept 2009	Issue 1 written by Headteacher & agreed by Management Committee
2	Oct 2009	Oct 2010	Issue 2 follows an LA review of the Safeguarding/Child Protection Policy.
3	30/9/10	Sept 2012	Issue 3 follows review by Elise Robinson & Leeann Evans
4	May 2013	May 2014	Review by designated staff in Service and Management Committee. Policy published on website
5	7.12.13	Dec 2014	Review by new Headteacher & Management Committee
6	10.3.14	March 2015	Review following whole staff e-safety training and e-safety self-assessment
7	10/03/15	March 2016	Annual review and amendments made following changes to LA procedures
8	14/4/16	April 2017	Annual review and amendments made following publication of updated DfE guidance 'Keeping Children Safe in Education (March 2015/Sept 2016 draft), Working together to Safeguard Children (March 2015) and with reference to Cumbria LSCB online Procedures Manual
9	21/11/16	November 2017	Amendments following publication of KCSIE (September 2016) and new DfE guidance on Children Missing Education (September 2016)
10	July 2017	July 2018	Following external safeguarding audit
11	July 2018	July 2019	Review and amendments following publication of KCSIE 3/9/18 and Operation Encompass info added 28/9/18
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13	Sept 2020	Sept 2021	Annual review taking account of KCSIE from 1/9/20 and any impact ongoing from Covid19 pandemic
14	Sept 2021	Sept 2022	Annual review taking account of KCSIE from 1/9/21
15	July 2022	July 2023	Annual review taking account of KCSIE from 1/9/22
16	Nov 2022	Nov 2023	Review due to staff changes and addition of appendices J and K
17	July 2023	July 2024	Review taking into account KCSiE 2023 from 1/9/23
18	July 2024	July 2025	Review taking into account Working Together 2023, Sharing nudes and semi-nudes Guidance (March 2024), changes to Safeguarding Team & Management Committee, update to Curriculum section and Information Sharing Advice (May 2024) and KCSiE 2024
19	July 2025	July 2026	Review taking into account revised hub arrangements from 1/4/25 and KCSiE 2025 from 1/9/25

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# SECTION 1: PRINCIPLES

## 1. VALUES

It is the Policy of South Cumbria Pupil Referral Service to provide clear direction to staff and others about expected practice in dealing with Child Protection issues. We believe that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practice which protects them.

Safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development across our service. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

The Service has a commitment to the development of good practice and sound procedures, ensuring that child protection concerns and referrals are handled sensitively, professionally and in a way which supports the needs of children. The student's welfare is of paramount importance. If staff have any concerns about a child's welfare, they should act on them immediately.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action (KCSIE 2025).

## 2. INTRODUCTION

As of 1 April 2025, Cumbria Safeguarding Children Partnership has been replaced by new Multi-Agency Safeguarding Arrangements. Westmorland and Furness Safeguarding Children Partnership will cover the footprint of Westmorland and Furness Council

These local multi-agency safeguarding arrangements have been implemented in line with the requirements outlined in the statutory guidance, [Working Together to Safeguard Children](#).

All those working in education can contribute to the safeguarding and protection of the welfare of a child in need. According to the DfE, safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, inside or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes in line with new national professional practice standards

'Children' includes everyone under the age of 18.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

We recognise that high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult help all children, and especially those at risk of, or suffering from, abuse.

We will therefore:

1. Establish and maintain an ethos where children feel secure, are encouraged to talk, and are listened to. We will be alert to our children's needs and learn to recognise when they might be distressed or concerned.

2. Ensure that children know that there are adults in the school who they can approach if they are worried or are in difficulty. We will ensure that every child in our school has at least one member of staff who they might feel able to share concerns with.
3. Include in the curriculum activities and opportunities which equip children with the skills they need to stay safe and develop realistic attitudes to the responsibilities of adult life.
4. Follow the Safeguarding Children Partnership's published local protocol for assessment to ensure the provision of early help as set out in statutory guidance, including using the Early Help Assessment where appropriate.
5. Ensure that wherever possible every effort will be made to establish effective working relationships with parents and colleagues from other agencies.

Children and young people learn best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them. It is our aim to create a high-quality setting which is welcoming, safe and stimulating, and where young people are able to enjoy and grow in confidence.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL, or a DDSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

This Child Protection Policy must be read in conjunction with the Overarching Safeguarding Statement and other policies (see Section 6).

### 3. ETHOS

At South Cumbria Pupil Referral Service, the health, safety and well-being of all our students are of paramount importance to all the adults who work here. All of our students have the right to protection, regardless of age, gender, ethnicity or disability. They have a right to be safe in our care; this is enhanced by the adoption of the Relationships & Behaviour Regulation Policy which includes our procedures for preventing and dealing with cases of bullying.

South Cumbria Pupil Referral Service regards all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm and abuse.

There is no place for extremist views of any kind in our school, whether from internal sources – pupils, staff, visiting adults, governors or external sources – school community, external agencies or individuals. Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils, staff, visitors or parents will always be challenged and where appropriate dealt with. Where misconduct by a teacher is proven, the matter will be referred to the National College for Teaching and Leadership for their consideration. Misconduct by other staff will be dealt with under normal school disciplinary procedures.

We encourage pupils to respect the fundamental British Values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the pupils; reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils. All materials to be used in school including video and film should be appropriately age related.

We will ensure the content of the curriculum includes social and emotional aspects of learning and that child protection is included in the curriculum to help young people stay safe, recognise when they don't feel safe and identify who they might/can talk to. We provide a curriculum that will help to equip our students with the skills they need including materials and learning experiences that will encourage them to develop essential life skills and protective behaviours. The PSHE (Personal, Social & Health Education) Curriculum will include elements of how young people can recognise different risks in different situations, and how to behave in response to equip them with the skills needed to keep themselves safe and empower them to feel safe.

South Cumbria Pupil Referral Service recognises the importance of creating and promoting a positive, supportive, neutral and secure environment where students can develop a sense of being valued and heard in their own right and where they feel safe, secure and respected. We aim to provide suitable support and guidance so that students have a range of appropriate adults to approach if they are in difficulties and ensure they know adults in the Service can be approached if they are worried or in difficulty. We will encourage them to talk openly and enable them to feel confident that they will be listened to.

We are also committed to establishing a safe physical environment in which young people can learn and develop both personally and academically and achieve success in the following as stated in the Children Act 2004.

Every effort will be made to work in partnership with other agencies and seek to establish effective working relationships with parents, carers and other colleagues so enabling the Management Committee to fulfil their obligations (as if they were a Governing Body) to have arrangements about safeguarding and promoting the welfare of children in place.

*"The Governing Body of a maintained school shall make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school"* - Education Act 2002. Reference: Section 175.

## 4. POLICY AIMS

There are three main aims to our Child Protection Policy:

- Prevention: by creating a positive atmosphere and providing high quality teaching and pastoral support to students. We are aware that young people can be exposed to extremist influences or prejudiced views from an early age which originate from a variety of sources and media, including via the internet, and at times pupils may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. It is imperative that our pupils and parents see our school as a safe place where they can discuss and explore controversial issues safely and in an unbiased way and where all staff encourage and facilitate this;
- Protection: by following agreed procedures and ensuring staff are appropriately recruited, trained and supported to respond appropriately and sensitively to Child Protection concerns. As part of their induction to the school, all staff and volunteers are given training in child protection matters. They are made aware of procedures relating to child protection in terms of their own actions and the need to pass information on to appropriate staff. If a member of staff or volunteer suspects that a child is a victim of abuse or a student discloses that he/she is being abused, information must be passed without delay to Designated Safeguarding Lead who has a legal procedure to follow in all cases of disclosed or suspected abuse;
- Support: by providing support for students and Service staff and for young people who may have been or are being abused. Staff must recognise, however, that they should not guarantee complete confidentiality when in one-to-one discussion with students - However 'Secret' a disclosure is to the student it must be shared with those who should or need to know

We will do these things by:

- ensuring we practice safe recruitment in checking the suitability of adults to have contact with young people;
- promoting good health and preventing the spread of infection;
- managing behaviour and adopting safe and acceptable physical intervention techniques (refer to our Relationships & Behaviour Regulation Policy for details);
- raising awareness of child protection issues and equipping young people with the skills needed to keep them safe and empowering young people to feel safe;
- being alert to any issues of concern in young people's lives at home or elsewhere;
- ensuring all staff are able to recognise the signs and symptoms of abuse and radicalisation and are aware of the Service's procedures and lines of communication for reporting concerns/suspected or actual cases of abuse or suspected radicalisation.
- ensuring extra care is taken to ensure that signs of abuse, neglect and exploitation are identified and interpreted correctly, particularly for vulnerable groups such as young people with communication difficulties or who use alternative/augmented communication systems;
- monitoring and supporting children and young people who have been identified as having welfare or protection concerns in accordance with his/her agreed Child Protection Plan;
- keeping confidential records which are stored securely and shared appropriately with other professionals;
- ensuring all steps are taken to maintain site security and student's physical safety by establishing a safe environment in which young people can learn and develop;
- ensuring staffing arrangements meet the needs of all young people and ensure their safety. We will ensure that young people are adequately supervised and decide how to deploy staff to ensure the student's needs are met;
- maintaining records, policies and procedures.

## 5. ENTITLEMENT

Each young person supported by our Service, regardless of their background or home circumstances could be the victim of child abuse, whether it be by a parent, other adult or other young person known to them. They are therefore all entitled to the same degree of protection and support. Each young person in our Service will also develop the skills which could enable prevention of abuse by learning about keeping safe, and who to ask for help if their safety is threatened.

We have and implement a Single Equality Scheme (SES) with objectives to promote equality of opportunity for young people in our care, including support for those with special educational needs or disabilities. Our SES includes the whole Service community but specifically for young people, how the individual needs of all young people will be met (including how those who are disabled or have special educational needs, will be included, valued and supported, and how reasonable adjustments will be made for them); the name of the Special Educational Needs Co-ordinator (David Smith); arrangements for reviewing, monitoring and evaluating the effectiveness of inclusive practices that promote and value diversity and difference; how inappropriate attitudes and practices will be challenged; and how the provision will encourage young people to value and respect others.

## 6. IMPLEMENTATION

This Policy applies to all who come into contact with young people in South Cumbria Pupil Referral Service, including: teachers, supply teachers, learning support staff, teaching assistants, mid-day supervisors, admin staff, meals supervisors, cleaners, students, parent helpers/volunteers, members of the Management Committee and visitors including contractors.

Contractors and visitors are issued with a 'Safeguarding Children' leaflet to inform them of key points. (Appendix D)

This policy should be read in conjunction with other related policies and procedures including:

- Overarching Safeguarding Statement
- Health and Safety Policy
- Online Safety Policy and Cyber Security Resilience Strategy
- Relationships & Behaviour Regulation Policy including procedures for preventing and dealing with Bullying and Racism, Positive Handling, Support and Physical Intervention Procedures.
- Relationships, Sex & Health Education Policy
- Single Central Record
- Self-harm Policy
- Suicide Safety Policy
- Safeguarding Children - Leaflet for Visitors and Contractors (Appendix D)
- Single Equality Scheme & Accessibility Plan
- Code of Conduct (relates to staff)
- Images in schools Policy
- Administration of Medication Policy
- Supporting Pupils with Medical Needs Policy
- Managing Intimate Care & Toileting Procedures
- Educational Visits Procedures (including procedures for assessing risks)
- First Aid and Accident Procedures
- Attendance Policy
- Data Protection Policy
- Special Educational Needs Policy
- Risk Assessments (inc. Fire Safety)
- Premises Management including Security Measures (Formal Inspections and Buildings Register)
- South Cumbria Pupil Referral Service Local Offer

and DfE, Ofsted and Westmorland & Furness Safeguarding Children Partnership guidance including:

- [DfE Keeping Children Safe in Education \(2025\)](#)
- [DfE Working Together to Safeguard Children \(2023\)](#)
- [DfE What to do if you're worried a child is being abused – Advice for Practitioners, March 2015](#)
- [DfE Statutory Framework for Early Years Foundation Stage – March 2021](#)
- [DfE Behaviour in Schools: Guidance for Headteachers and school staff – September 2022](#)
- [DfE Use of Reasonable Force – Advice for Head teachers, Staff and Governing Bodies, July 2013](#)
- [DfE The Prevent Duty – Departmental advice for schools and childcare providers](#)
- [DfE Promoting fundamental British values as part of SMSC in schools – Departmental advice for maintained schools - November 2014](#)
- [DfE Children Missing Education – September 2016](#)
- [Working together to improve school attendance May 2022](#)
- [GOV.UK Prevent Duty Guidance \(2023\)](#)
- [Ofsted: How we inspect safeguarding](#)
- [Cumbria Safeguarding Children Partnership](#)
- [Guidance for Safer Working Practice for Adults who Work with Children and Young People / Code of Conduct for Staff – April 2020](#)

The Westmorland & Furness Safeguarding Children Board (WFSCP) is responsible for monitoring the effectiveness of the organisations' implementation of their duties under Section 11 of the Childrens Act 2004.

## 7. THE CHILDREN ACT 1989

The Children Act 1989 introduced two key elements to Child Protection:

### 7.1 Child Support

Section 17 of the Children Act 1989 aims to identify those young people and families in need of support.

Where the child is not at risk of significant harm, but it is believed that the family would benefit from receiving services from Children's Social Care.

Under Safeguarding Procedures staff can make a referral to the Children's Services Directorate for child and family support, this must be done with the consent of the parent/carer.

## 7.2 Child Safety

Section 47 of the Children Act 1989 places duty on Children's Social Care to assess those children who are deemed to be either at risk of suffering significant harm or likely to suffer significant harm.

Parents/carers permission must be sought before discussing a referral about them with other agencies, unless permission-seeking may itself jeopardise the investigation or place a child at risk of harm.

If you suspect that a child is being abused but there is nothing directly stated, seek an explanation for your concerns as appropriate, usually from parents/carers and/or the child without raising the question of abuse.

## 8. COMMUNICATION

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of young people in our care. We will ensure we are in a position to keep records in English, to liaise with other agencies in English, to summon emergency help, and to understand instructions such as those for the safety of medicines or food hygiene.

## 9. ROLES AND RESPONSIBILITIES

The Role of ALL Staff:

- All staff have a responsibility to provide a safe environment in which children can learn.
- All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.
- All staff then have a responsibility to take appropriate action, working with other services as needed.
- All staff have a responsibility to read and properly understand the School's Child Protection Policy and the procedures to follow if they have concerns about a child regardless of the presumed seriousness of the case.
- In addition to working with the Designated Safeguarding Lead staff members should be aware that they may be asked to support social workers to take decisions about individual children.
- If at any point, there is a risk of immediate serious harm to a child a referral will be made Westmorland & Furness Safeguarding Hub immediately – anybody can make a referral.

If staff have a concern, you should speak to the designated safeguarding lead (or one of the deputy designated safeguarding leads).

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (DfE, May 2024) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information. See also Appendix F.

The Management Committee and Headteacher should ensure should facilitate a whole school or college approach to safeguarding making sure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

It is recommended all educational professionals read the [DfE Data Protection guidance for schools \(2024\)](#).

The Data Protection Act 2018 and 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. ([Data protection toolkit for schools](#))

In addition to the above, as part of wider safeguarding responsibilities, staff will be alert to:

- disclosures by pupils of their exposure to the extremist actions views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out;
- graffiti symbols, writing or artwork promoting extremist messages or images;
- pupils accessing extremist material on-line, including through social networking sites
- parental reports of changes in behaviour, friendship or actions and requests for assistance
- local schools, LA services and police reports of issues affecting pupils in other schools or settings;
- pupils voicing opinions drawn from extremist ideologies and narratives;
- use of extremist or 'hate' terms to exclude others or incite violence;
- intolerance of difference, whether secular or religious or, in line with our Single Equality Scheme, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
- attempts to impose extremist views or practices on others;
- anti-western or anti-British views.

All adults working with or on behalf of children have a shared responsibility to safeguard and promote the welfare of young people. However, there are certain designated persons in the Service with more specific roles and responsibilities:

## 9.1 The Role of the Designated Safeguarding Lead (DSL)

The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns having received appropriate training including level 3 safeguarding and Safer Recruitment. The DSL will liaise with the senior mental health lead (David Smith) and the Mental Health Support Team, where safeguarding concerns are linked to mental health.

DSLs should take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.

The Management Committee should ensure the designated safeguarding lead has the appropriate status and authority within the school or college to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and

monitoring systems and processes in place).

The Management Committee must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered pupils who are looked after (Andrew Ribchester). On commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. [Annex C of KCSiE 2025](#) share information describes the broad areas of responsibility and activities related to the role.

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

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

Liaison and Referrals – The DSL will lead on:

- liaison with local statutory children's services agencies and the Westmorland & Furness Safeguarding Children Partnership (WFSCP)
- liaison with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#).
- [NPCC- When to call the police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- referring cases of suspected abuse or allegations to local Children's Services Customer Advisor (see point 6 for contact details) and discuss with the Duty Social Worker.
- referring to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- liaising with the Virtual School head teacher for pupils who are Looked After (including those students with a social worker under the Virtual Head's extended remit).
- acting as a source of support, advice and expertise within the Service when deciding to make a referral.

The Children's Services Single Referral Form can be found [HERE](#).

The three safeguarding partners (local authorities, police and Clinical Commissioning Groups) have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with, and the expectations placed on any agencies and organisations by the arrangements.

The three safeguarding partners should make [arrangements](#) to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

If named as a relevant agency, schools and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Support and Awareness Raising:

- Provide support, advice and guidance to any other staff member on an ongoing basis and on any specific safeguarding issues as required.
- Ensure the child protection/safeguarding policy is updated and reviewed annually and work with the

Management Committee regarding this.

#### Supporting Students at Risk:

Our Service recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. The Service may be the only stable, secure and predictable element in the lives of the children at risk.

We will endeavour to support students through:

- a curriculum which encourages self-esteem and self-motivation;
- An ethos which promotes a positive, supportive and secure environment where everyone is valued;
- the implementation of a shared policy regarding relationships and behaviour regulation;
- a consistent approach which supports all children;
- regular liaison with other professionals and agencies who support the students and their families;
- the development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

## 9.2 The Role of the Head teacher

- To ensure that the policies and procedures adopted by the Management Committee are fully implemented and followed by all staff.
- To ensure sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- To ensure all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner by supporting the whistle blowing policy.

## 9.3 The Role of the Management Committee

Good practice suggests that a designated member of the Management Committee is appointed for Child Protection – In our committee this is Sarah Campbell.

The Governing Body of a school ensures that

- a) procedures are in place that are in accordance with local authority and locally agreed inter-agency guidance;
- b) their implementation is monitored for their effectiveness and that they are reviewed at least annually.
- c) The procedures include the management of allegations against people who work with children, safe recruitment practice and reporting children missing from education
- d) where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some SEND

Although it does not have the same accountability as a Maintained School Governing Body, the Management Committee of South Cumbria Pupil Referral Service will endeavour to replicate the obligations of such a Governing Body.

## 9.4 Human Rights Act 1998

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect

an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission](https://www.equalityhumanrights.com) (equalityhumanrights.com).

## 9.5 Equalities Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, the Management Committee should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found [here](#).

## 9.6 Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties, is set out in the advice linked in paragraph 90.

The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics (see para 87) and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific

issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. For further information please see [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com).

## 10. ATTENDANCE AT CHILD PROTECTION CONFERENCES

The Designated Safeguarding Lead or the most relevant person identified by the DSL to deputise will be expected to attend the initial Child Protection Conference and key staff will support the DSL to provide a written report which should have been shared with the family before the Conference.

If a child is made subject to a Child Protection Plan, it may be more relevant for another member of staff such as an Engagement Officer or Key Teacher to attend the subsequent core group meetings and they will be given appropriate support around child protection issues by the Designated Safeguarding Lead.

## 11. RECOGNISING ABUSE

Abuse - a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. (WTTSC 2023).

In the Children Acts 1989 and 2004, a child is anyone who has not yet reached their 18th birthday.

Safeguarding and promoting the welfare of children is defined in 'Working Together to Safeguard Children' (2023) as:

- protecting children from maltreatment;
- preventing impairment of children's physical or mental health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- undertaking that role to enable those children to have optimum life chances and to enter adulthood successfully.

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

## 11.1 Physical Abuse

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.

## 11.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development:

- It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs.
- It may involve seeing or hearing the ill-treatment of another – for example where there is fighting or violence in the home.
- It may involve serious bullying (including via electronic media), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

For more information, see our procedures for preventing and dealing with bullying within the Relationships & Behaviour Regulation Policy.

## 11.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not 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.

They may also include 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.

[Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours](#)

## 11.4 Neglect

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
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (WTTSC, 2023)

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 caregivers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 11.5 Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for schools and colleges on the TES website and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk). Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website.

The Cumbria Safeguarding Children Partnership Procedures Manual provides specific guidance on a range of safeguarding issues which settings may have to address. [Click here to access](#). Further advice on specific safeguarding issues is also found in Annex B of [Keeping Children Safe in Education](#).

### Children Missing from Education

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county lines.

It is important the school's response to children missing from education supports identifying such abuse and helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community

Information regarding schools' duties regarding children with unexplainable and/or persistent absence from education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#)

### Children who go Missing During the School Day

When a pupil's whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of a crime or at risk of harm to themselves or another. Where reasonably possible, school holds more than one emergency contact number for each student. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child with unexplainable and/or persistent absence from education is also identified as a welfare and/or safeguarding concern.

Once a pupil is identified as missing by any member of school staff, the Designated Safeguarding Lead will be informed. Staff will use professional judgement and risk assess the urgency of the situation to help inform the timeframe required in establishing the pupils' whereabouts before notifying the Police.

Timeliness should be on a case-by-case basis.

Designated Safeguarding Lead should, together with the key teacher, assess the child's vulnerability.

- School staff will try to locate the pupil and try to establish the whereabouts of them.
- School staff will contact home and try to contact the pupil via their mobile telephone if known.
- Where applicable the child's social Worker should be informed and asked to undertake a home visit.
- If the child's whereabouts cannot be established the police should be informed and the child reported missing.

## Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators and alleged perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the (alleged) perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

All suspected cases of CE will be referred to the [Safeguarding Hub](#).

By being aware of the warning signs of CE school staff and other adults can help stop abuse before it develops further. Some of the warning signs are:

- The child may become especially secretive and stop engaging with their usual friends.
- They may be associating with or develop a sexual relationship with older males or females.
- They may go missing from home – and be defensive about their location and activities, often returning home late or staying out all night.
- They may be missing school.
- They may be in possession of new, expensive items which they couldn't normally afford, such as mobile phones, iPads or jewellery.
- They may exhibit a sudden change in dressing patterns, hair and make-up use or musical taste.
- They may look tired and/or unwell, sleeping during the day.
- They may have marks or scars on their body which they try to conceal.
- They may adopt new 'street language' or respond to a new 'street' name

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as (alleged) perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

[Child exploitation disruption toolkit](#) – HO statutory guidance  
[Preventing Child Sexual Exploitation](#) – The Children's Society and Home Office

## County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. 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 (alleged) 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.

## Cybercrime

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. See also section on online safety.

## Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The emotional responses of children who witness domestic violence including controlling and coercive behaviour and abuse may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the violence and at the other parent for being unable to protect them). Physical responses may include stress-induced aches and pains, bedwetting, and inability to concentrate. Some children are the direct victims of other types of abuse or injured while trying to intervene on behalf of their parent or sibling. Practitioners should also be mindful when recognising controlling and coercive behaviour in the context of children who are being exploited.

The behavioural responses of children who witness domestic violence and abuse may include acting out, withdrawal, or anxiousness to please. A change in achievement or behaviour at school can be an indicator of problems at home.

We are an Operation Encompass School (The reporting to schools the following day by the police (by a Operation Encompass Designated Officer) when a child or young person has been involved in or exposed to an incident of domestic abuse or hate crime.

Domestic violence and abuse may have a long term psychological and emotional impact in a number of ways:

- Children may be greatly distressed by witnessing (seeing or hearing) the physical and emotional suffering of a parent, or witnessing the outcome of any assault;
- Children may be pressurised into concealing assaults, and experience the fear and anxiety of living in an environment where abuse occurs;
- The domestic violence and abuse may impact negatively on an adult victim's parenting capacity;
- Children may be drawn into the violence and themselves become victims of physical abuse.

For children living in situations of domestic violence and abuse, the effects may result in behavioural issues, absence from school, difficulties concentrating, lower school achievement, ill health, bullying, substance misuse, self-harm, running away, anti-social behaviour and physical injury.

Key members of staff have accessed training and have cascaded this during twilight sessions.

[Keeping Children Safe in Education \(DfE 2025\)](#) contains important information about specific forms of abuse and safeguarding issues.

## Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy. If a child is referred to a Mental Health facility, a referral to Social Care should be made.

The department has published advice and guidance on [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Better Health Every Mind Matters](#) for links to all materials and lesson plans

Any child or young person, who self-harms or expresses thoughts about this or about suicide, must be taken seriously and appropriate help and intervention should be offered at the earliest point. See our Self-harm and Suicide Safety policies for further information and guidance regarding support available for students and for staff working with students experience this level of thought.

### Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

[Safeguarding children who may have been trafficked – DfE and Home Office guidance](#)  
[Care of unaccompanied migrant children and child victims of modern slavery – DfE statutory guidance](#)  
[Modern slavery: how to identify and support victims – HO statutory guidance](#)

### Child on Child (previously peer on peer) abuse

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 or college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it 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 their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, 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 safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- 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 on-line sexual harassment that may be stand alone 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 nudes 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 them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. 'Upskirting' is a criminal offence.
- sexting (also known as youth produced sexual imagery); and
- 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).

Be aware that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face). Be aware that children can abuse their peers online through:

- Abusive, harassing, and misogynistic messages
- Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups - Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
- Sharing of abusive images and pornography, to those who don't want to receive such content.

All staff should be clear as to the school's or college's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#).

Child on child abuse can sometimes have dire consequences and staff should consider:

- The risk the young person poses to themselves;
- The risk the young person poses to others;
- What is the risk from others to the young person.

Preventing Radicalisation [The Prevent Lead for the service is Lisa Balderstone](#)

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism (definition March 2024) is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Protecting children from the risks of radicalisation and extremism is seen as part of this school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. Since July 2015, schools are under a statutory duty to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty.

Statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

1. Risk Assessment – we will assess the risk of children being drawn into terrorism and have clear procedures in place for protecting children at risk of radicalisation.
2. Working in Partnership – we will ensure that our procedures take into account the policies and procedures of the Safeguarding Children Partnership.
3. Staff training – we will ensure that staff have access to Prevent awareness training in order to equip them with the skills and knowledge to identify children at risk of being drawn into terrorism and to challenge extremist ideas. As a minimum, the DSL will receive Prevent awareness training the detail of which will be cascaded to other staff/volunteers as appropriate.
4. Online safety – we will ensure that children are safe from terrorist and extremist material when accessing the internet in school. The school's approach is reflected in this policy which, amongst other things, includes appropriate filtering and monitoring on school devices and school networks.

We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. We seek to protect children and young people against the messages of all violent extremism.

We are aware of and understand when it is appropriate to make a referral to the Channel programme ([prevent@cumbria.police.uk](mailto:prevent@cumbria.police.uk)) and/or the Safeguarding Hub. All staff receive training on this.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

## Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or involved with serious violent crime. These may include increased absence, a change in friendships or relationships with older individuals or groups, a decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Offices' [Advice to schools and colleges on gangs and youth violence - GOV.UK](#) and [Criminal exploitation of children and vulnerable adults: county lines - GOV.UK](#) guidance.

Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse, neglect and exploitation. Examples of potential indicators of abuse, neglect and exploitation are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse, neglect and exploitation and what to look out for

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider

whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

### Sexual Harmful behaviour

Sexual Harmful behaviour involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not 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. They may also include 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. In addition, Sexual abuse includes abuse of children through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under s5 Sexual Offences Act 2003.

### So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

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

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about Honour-based' violence (including Female Genital Mutilation and Forced Marriage), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage ([chapter 8 provides guidance on the role of schools and colleges](#)) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#). School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

# SECTION 2: PROCEDURES

## 12. INDUCTION AND TRAINING

All staff will be required to undertake an appropriate level of training, including safeguarding training. We will allow all staff time to read and understand the overarching Safeguarding Statement, this Child Protection Policy and the most recent Keeping Children Safe in Education. We will ensure that all staff have up to date knowledge of safeguarding issues (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). We will ensure our staff are kept informed about child protection procedures via our staff briefings and training sessions as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Our regular safeguarding training for staff is integrated, aligned and considered as part of the whole school/college safeguarding approach and has regard to the Teachers' Standards, with the expectation that teachers manage behaviour effectively for learning.

Training:

- To recognise how to identify and respond appropriately to signs of abuse, neglect and exploitation and when it is appropriate to make a referral. All staff have Level 1 training and those with responsibility have Level 2 or 3 depending on the level of responsibility.
- Have a working knowledge of how the Westmorland & Furness Safeguarding Children Partnership Board operate, Child Protection Procedures, the conduct of a child protection case conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the Service's Child Protection Policy and Safeguarding Statement.
- Ensure all staff receive induction training covering child protection and are able to recognise and report any concerns immediately when they arise.
- Training for all staff must be at least annually with regular updates as necessary.
- Be able to keep detailed accurate secure written records of referrals/concerns/discussions and decisions and the rationale for those decisions.
- Obtain access to resources and attend any relevant or refresher training courses at required frequencies.
- Secure opportunities for continued professional development for staff - we will support our staff to improve their qualification levels wherever possible.

Training will enable staff to identify signs of possible abuse, neglect and exploitation at the earliest opportunity, and to respond in a timely and appropriate way including:

- significant changes in children's behaviour;
- deterioration in children's general well-being;
- unexplained bruising, marks or signs of possible abuse or neglect;
- children's comments which give cause for concern;
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff, or any other person working with the children, for example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images;
- internal Service procedures, roles and responsibilities;
- dealing with disclosures from children;
- whistle blowing procedures as they refer specifically to Child Protection;
- emergency evacuation procedures;
- the Service's Single Equality Scheme, and
- general health and safety issues.

Training is organised by the DSL in line with the Safeguarding Children Partnership guidance. All staff have undertaken whole school – Level One Safeguarding Training which will be refreshed at least every three years.

We will ensure that regular staff appraisals are carried out to identify any training needs, and secure opportunities for continued professional development for staff. We will support our staff to improve their qualification levels wherever possible.

The Management Committee should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The leadership team will ensure the DSL(s) attend the required DSL safeguarding training when they first take up the role and that they continue to update their knowledge on an on-going basis and at least every 2 years as required by guidance. The DSL has undertaken both Level 2 and Level 3 (Multi-Agency) Safeguarding Training. The Deputy DSLs have undertaken Level 2 & 3 Safeguarding Training.

The DSL will ensure that all new staff and volunteers are appropriately inducted as regards the Service's internal safeguarding procedures, including those for Child Protection and communication lines. This will also be a regular item at staff meetings.

The Management Committee will ensure that at least two appropriate members of the staff team complete accredited Safer Recruitment Training in line with NSCL/CWDC requirements which will be refreshed at least every 5 years – see Section 25 for further details.

The Management Committee will ensure appropriate support and supervision is in place for staff.

The DSL / Head Teacher will provide an annual report to the Management Committee detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained. This, along with Induction Training and other safeguarding training including health and safety related training will be included in the Service staff Training Plan.

## 13. ALLEGATIONS MADE AGAINST TEACHERS AND OTHER STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

Westmorland & Furness Safeguarding Children Partnership (WFSCP) is responsible for ensuring that there are effective inter-agency procedures for dealing with allegations of abuse by those who work with children, in accordance with the statutory guidance Working Together to Safeguard Children (DfE 2023).

This procedure is provided to address the matter of school-based staff who are the subject of such allegations and is written in accordance with the statutory guidance documents Keeping Children Safe in Education (DfE 2025, Part 4).

This relates to managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance 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 AND/OR
- Possibly committed a criminal offence 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 towards a child or children in a way that indicates that he/she is unsuitable to work with children.

These procedures relate to all staff and volunteers and supply staff employed directly by the school, whether in a paid or unpaid capacity regardless of whether the school or college is where the alleged abuse took place. They do not apply to staff working in schools who are employed by contract or local authority employers, for whom a separate procedure applies. Should any allegation be received against such staff, their manager must be contacted in the first instance. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Supply teachers - In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Management Committee should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

The procedures set out what the school must do should such allegations be received. The actions of agencies other than the school are provided here only for information purposes.

Any allegation must be reported to the Head Teacher (Lisa Balderstone).

In the event that it is the Head Teacher who is the subject of the allegations, the Senior Manager is the Chair of the Management Committee (Janet Willis).

In the event of the absence of the Head Teacher, or the Chair of the Management Committee, an Assistant Head (David Smith/Michaela Kemp/Andrew Ribchester) or Vice Chair (Steve Jefferson), whichever is appropriate, will deal with the allegation.

To speak to a LADO (local authority designated officer for dealing with allegations against staff) for advice please contact Multi-Agency Business Support Team who will take your details and ensure a LADO returns your call:

[lodo@westmorlandandfurness.gov.uk](mailto:lado@westmorlandandfurness.gov.uk) Tel 0300 303 3897  
Amanda Quirke Team Manager, [Amanda.Quirke@westmorlandandfurness.gov.uk](mailto:Amanda.Quirke@westmorlandandfurness.gov.uk)  
Laura Cross LADO,  
Lee Postlethwaite LADO  
Peter Goulston LADO Assistant.  
LADO working hours are Monday to Thursday 9am - 5pm and Friday 9am - 4.30pm.

In case of emergency outside of the above hours please contact Emergency Duty Team on 0300 373 2724.

Send completed notification forms to the Safeguarding Hub, using any of the following methods: (please note: if sending by email we advise that the document should be password protected)

Please note if you are worried that a child is at risk of immediate harm, please contact the [Safeguarding hub on 0300 373 2724](tel:03003732724) / [safeguarding.hub@westmorlandandfurness.gov.uk](mailto:safeguarding.hub@westmorlandandfurness.gov.uk)

## THE PROCEDURE

Wherever possible:

- obtain written details of the allegation, signed and dated by the person receiving the allegation;
- countersign and date the written details;
- record any other information and names of any potential witnesses;
- establish a chronology of significant events;
- consider any information already known about those involved;
- discreetly check any incident or log books;
- on the basis of these factors, make a professional judgment, and record the reason for any subsequent action taken (includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk).

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

The Head Teacher must inform the LADO of all allegations that meet the criteria within one working day and consult on whether the threshold for referral to Children's Services Social Care is met. Where there is evidence of a possible criminal offence, the referral to Children's Services Social Care will need to be made without delay to ensure that the police can begin a formal investigation, and that forensic evidence is not lost or interviews with children or adults compromised.

The Head Teacher should take no other action with regard to the employee until after having taken advice from the LADO.

The LADO will provide advice and guidance on the allegation, liaise with the police and other agencies and monitor the progress of the case to ensure that it is dealt with as quickly as possible consistent with a thorough and fair process. This process will need to balance the requirements of protecting children and ensuring prosecution of any alleged offences whilst respecting the position of an adult whose future employment in terms of working with children may be at risk.

It is acknowledged that in any school there may be concerns about staff conduct that falls short of the above criteria, but which may be regarded as inappropriate conduct (e.g. alleged use of inappropriate forms of control such as shouting at children). Nevertheless, all such incidents should be reported to the school's Head Teacher who will log the discussion and will refer to the LADO for advice.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the Head Teacher and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Head Teacher should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

## NEXT STEPS

If the threshold for referral is NOT met ([Low Level Concerns](#)):

- If the matter does not meet the criteria for referral to Children's Services Social Care, the matter will be dealt with by the Head Teacher acting under the advice and guidance of the LADO.

- The Head Teacher should inform the accused person about the allegation as soon as possible after consulting the LADO. It is extremely important that the Senior Manager provides them with as much information as possible at that time.
- The allegation may be substantiated following further enquiries and if substantiated may be addressed through guidance and/or training. Such incidents need to be dealt by the staff member's line manager under the guidance of the school's Head Teacher using the school's procedures for addressing issues of conduct and performance.
- The school will therefore be responsible for considering the setting up of any disciplinary investigation, organising the interviewing of and support for the child and advising the parent and staff member as to the process and the outcome of the investigation. The Head Teacher will be required to report back to the LADO and advise how the matter has been concluded.
- The Head Teacher will keep a record of all such cases and the record should be made available to the LADO. Clearly if the enquiries reveal that the allegation may be more serious than originally stated, further advice should be sought from the LADO as to whether the threshold for referral has now been reached.

The Management Committee should ensure procedures are in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members (including supply staff, volunteers, and contractors). Advice on allegation/concerns that do not meet the harms threshold can be found in section 2 of part 4 of [KCSiE \(2025\)](#) these are referred to as 'low level concerns'.

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

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

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

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

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

Low-level concerns may arise in several ways and from a number of sources. For example: 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.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

There is further detail regarding Low level Concerns in the school's Code of Conduct document.

### Sharing low-level concerns

We ensure we share confidentially all concerns initially with the Headteacher (who is also the DSL).

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

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

### Recording low-level concerns

All low-level concerns should be recorded using the form on Behaviour watch. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Staff can self-report a low-level concern.

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one). Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

If the threshold for referral is MET:

- If the LADO and Head Teacher decide that a referral needs to be made to Children's Services a formal referral should be made by the Senior Manager to the Safeguarding Hub.
- The Safeguarding Hub will use the procedures outlined in the CSCP's document, Chapter 6 Safeguarding children; handling individual cases as a matter of urgency.
- [Threshold Guidance.pdf](#)

Action by Children's Social Care on receipt of a referral

The referral will be considered by the responsible Safeguarding Hub Local Manager who will decide whether the threshold is established to progress to a formal 'strategy discussion' within the framework of Chapter 6.7 of the Safeguarding Children Partnership procedures. (If the child is already receiving services from another Children's Services team, the responsible Local Manager will make the decision).

If the allegation is not demonstrably false or unfounded, and there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with Working Together to Safeguard Children.

If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and FE college staff are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.

If it is deemed sufficiently urgent, the strategy discussion may take place by phone.

At this point, the LADO will

- undertake to ensure the Head Teacher is provided with a copy of the full Safeguarding Children Partnership procedure for dealing with allegations, including an agenda for the Strategy Meeting.
- Ensure that either the Head Teacher or a suitable representative is invited to attend the Strategy Meeting.

FOR FURTHER INFORMATION, REFER TO FULL WFSCP PROCEDURE AND KCSIE 2025 and Appendix J details procedures for managing these concerns.

The decision on suspension/transfer to alternative duties of the staff member subject to the allegation is the responsibility of the Head Teacher having consulted with their HR adviser and the LADO. Suspension should never be an automatic step for staff subject to allegations; each case should be dealt with on its merits taking into consideration factors such as the seriousness of the allegation, the potential risks to children and whether it is possible to investigate the allegation whilst the person is still at work. The strategy meeting will make a recommendation to the setting if one is required but the ultimate decision rests with the Head Teacher.

Employers have a 'duty to refer' to the Disclosure and Barring Service (DBS) when they have concerns that a person has caused harm or poses a future risk of harm to children or vulnerable adults – See Section 26 for further details. In these circumstances we must make a referral to the DBS. If we dismiss or remove a member of staff or a volunteer because they have harmed a child or vulnerable adult, or we would have done so if they had not left, we must tell the DBS *Helpline: 01325 953795*

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on [GOV.UK](https://www.gov.uk). All staff need to be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. When in doubt – consult.

[The Information Commissioner has published guidance on employment records in its, The Information Commissioner Employment Practices Code which provides some practical advice on record retention](#)

## 14. DEALING WITH ALLEGATIONS FROM YOUNG PEOPLE

The way in which a member of staff talks to a child who alleges abuse could have an effect on the evidence that is put forward if there are subsequent proceedings, and it is important that staff do not jump to conclusions, ask leading questions, or put words in a child's mouth. If a child makes a disclosure to a member of staff or other adult working in the Service s/he should write a record of the conversation as soon as possible, stating exactly, in the child's words, what has been said, noting any action taken in cases of possible abuse. (see 14.1 for details of record keeping).

Inform the DSL, Lisa Balderstone (or in her absence the Deputy DSL Jeremy Mark, Leeann Bell, Megan Bland or Sara Rose), who will evaluate your assessment and offer support and advice regarding the next steps.

The DSL can;

- Make a telephone referral to Children's Services Safeguarding Hub (0300 373 2724 / [safeguarding.hub@westmorlandandfurness.gov.uk](mailto:safeguarding.hub@westmorlandandfurness.gov.uk)) and confirm in writing via the Children's Services Single Contact form [Click here to access](#) and upload the referral form from the bottom of the page.
- Initial contact will be made with the Children's Services Safeguarding Hub (see below) who will take basic details. A duty officer will then discuss the concern in more detail.
- The initial referral may be initially by telephone but must be followed up in writing within 48 hours.

[Click here to access CSCP Referral Guidance](#). The Referral Process is outlined at Appendix A.

LADO (Local Authority Designated Officer for dealing with allegations against staff)

[lado@westmorlandandfurness.gov.uk](mailto:lado@westmorlandandfurness.gov.uk) Tel 0300 303 3897

Amanda Quirke Team Manager, [Amanda.Quirke@westmorlandandfurness.gov.uk](mailto:Amanda.Quirke@westmorlandandfurness.gov.uk),

Laura Cross LADO

Lee Postlethwaite LADO

Peter Goulston LADO Assistant.

Complete an allegations notifications form (download from the CSCP website)

LADO working hours are Monday to Thursday 9am to 5pm and Friday 9am to 4.30

*All adults in the Service have a shared responsibility to safeguard and promote the welfare of all young people.*

Anybody with concerns about a child in Westmorland & Furness can contact Children's Services on this one single number at any time of day or night. This will enable callers to outline their concerns and the county triage service will give advice and if necessary, undertake assessments of need.

Staff must be aware that:

- It is not the responsibility of teachers or other staff or volunteers in the Service to investigate suspected cases of abuse;
- They should not take any action beyond that agreed in the procedures established by the Safeguarding Children partnership (WFSCP)

They cannot promise a young person complete confidentiality - instead they must explain that they may need to pass information to other professionals to help keep them or other young people safe.

Where there is perceived to be no risk of significant harm support may be sought via the completion of an Early Help Assessment or fed into an existing Team Around the Child (TAC) / Family (TAF).

The Early Help form can be accessed via the [Cumbria Safeguarding Children Partnership website](#).

Westmorland & Furness Early Help Team:

Phone: 0300 373 2723

Email: [early.help@westmorlandandfurnesscumbria.gov.uk](mailto:early.help@westmorlandandfurnesscumbria.gov.uk)

### Listening to Young People

Experience, and consultation with young people, shows that they will talk about their concerns and problems to people they feel they can trust, and they feel comfortable with. This will not necessarily be a teacher. It is therefore essential that all staff and volunteers in the Service know how to respond sensitively to a young person's concerns, who to approach for advice about them, and the importance of not guaranteeing complete confidentiality.

Young people also want to know that they will be listened to and their concerns will be taken seriously, so all staff should seek to demonstrate to students that it provides them with a safe environment where it is okay to talk.

Any member of staff or volunteer who is approached by a young person wanting to talk should listen positively and reassure them. They should record the discussion with the student as soon as possible and take action in accordance with the establishment's child protection procedures.

If a child chooses to disclose, you SHOULD:

- be accessible and receptive;
- listen carefully and uncritically at the young person's pace;
- take what is said seriously;
- reassure the young person that they are right to tell;
- tell the young person that you must pass this information on;
- make a careful record of what was said.

You should NEVER:

- take photographs or examine an injury;
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to young people about confidentiality or keeping 'secrets';
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or young person) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what you have been told;
- fail to pass the information on to the correct person;
- ask a young person to sign a written copy of the disclosure.

Vulnerable Groups: Children with SEND are more vulnerable to abuse, neglect and **exploitation** – given the nature of the students we work with across the service all students should be recognised as potentially vulnerable. For young people with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse, neglect and **exploitation** are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other young people.

## 14.1 Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college.

Staff must record any welfare concern that they have about a child on a Safeguarding form within the PRU's information management system. This record should be made using the 'safeguarding' forms on Behaviour Watch ensuring that the record includes the author and the date, time and place of the allegation.

All entries made on a safeguarding form are automatically copied into the Designated Safeguarding Lead (DSL) and Head teacher, Lisa Balderstone; the deputy DSLs Jeremy Mark, Leeann Bell, Megan Bland or Sara Rose with a body map (on Behaviour watch system or use Appendix C) where injuries have been observed to be passed to the DSL. Records must be completed as soon as possible after the incident/event and must be signed and dated – See Section 8.

Child protection records are stored centrally and securely by the Safeguarding Administrator and are shared on a 'need to know' basis only. They should be held separate from the child's curriculum file.

The Head Teacher is the DSL.

All child protection records will be forwarded to a child's subsequent school/setting under confidential and separate cover to the new DSL /Head Teacher.

## 15. CHILD ON CHILD SEXUAL VIOLENCE & SEXUAL HARASSMENT

The Management Committee should be aware that the DfE has published detailed advice to support schools and colleges. Advice is available in Section 5 of KCSiE 2025 and includes, what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment.

The guidance provides effective safeguarding practice and principles for schools and colleges to consider in their decision-making process. Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The school or college's initial response to a report from a child is important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

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

We recognise, acknowledge, and understand the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school or college's initial response. Appendix K gives a flowchart of responses to reports of sexual violence and sexual harassment.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

## 15.1 Sexual violence

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college. When referring to sexual violence, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

## 15.2 Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges.
  - sharing of unwanted explicit content
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

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

### 15.3 Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from 'normal and developmentally expected' to 'inappropriate, problematic, abusive and violent.' Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB).

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed [in Appendix I](#)

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

The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed '[Shore Space](#)' mental health, an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

### 15.4 Preventing abuse

Effective safeguarding practice is demonstrated when schools and colleges are clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date. As such:

- if required, the designated safeguarding lead (or a deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school's or college's policies (especially the child protection policy) and responses, and

- the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.

## 15.5 Support for schools and colleges

Schools and colleges should not feel that they are alone in dealing with sexual violence and sexual harassment. Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or a deputy) should lead the school or college response and should be aware of the local process for referrals to children's social care and making referrals to the police.

## 15.6 Responding to the report

It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

It is essential 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 occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment:

1. Manage internally
2. Early Help
3. Referral to Social care
4. Report to Police (Any report to the police will generally be in parallel with a referral to children's social care)

It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Further considerations as part of a multi-agency response (depending on each individual scenario) are outlined below and detailed in KCSIE 2025:

- Considering bail conditions
- Managing any delays in the criminal process/The end of the criminal process
- Safeguarding and supporting the victim
- Safeguarding and supporting the alleged perpetrator

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may

have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it.

An ongoing response is needed to safeguard and supporting the victim. The needs and wishes of the victim should be paramount (along with protecting the child) in any response. Further external sources of support are identified in part 5 of [KCSIE 2025](#).

## 15.7 Considering confidentiality and anonymity

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

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

Schools and colleges should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

## 16. WHISTLE BLOWING

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Our school has clear and accessible Whistleblowing procedures. Staff who use the whistleblowing procedures will have their employment rights protected.

All staff have an individual responsibility to bring matters of concern to the attention of the Head teacher via their line manager or Chair of the Management Committee. Not to do so may result in charges of serious neglect on their part where the welfare of a child is at risk.

Staff and other adults in this school are expected to:

- report any behaviour by colleagues or any other adult in school that raises concern;
- know who the named member of the management Committee is for reporting Whistleblowing to – Janet Willis
- report allegations against staff and volunteers to the Headteacher, or where they have concerns about the headteacher's response, report these directly to the Chair of the Management Committee – Janet Willis or the Local Authority Designated Officer (LADO).

Reference should also be made to the [Whistleblowing procedures](#).

Advice can also be sought regarding whistleblowing from the NSPCC Advice Line on 0800 028 0285 (available 8am -8pm Monday to Friday and 9am-6pm Saturday and Sunday) or email [help@NSPCC.org.uk](mailto:help@NSPCC.org.uk)

## 17.MEDICATION

### 17.1 Staff taking Medication/Other Substances

Persons working with children must not be under the influence of alcohol or any other substance which may affect their ability to care for children. If staff or volunteers who work with children are taking medication which may affect their ability to care for children, they should seek medical advice. We must ensure that they only work directly with children if medical advice confirms that the medication is unlikely to impair that staff member's ability to look after children properly. Staff medication on the premises must be securely stored, and out of reach of children, at all times.

### 17.2 Managing Medicines

We have and implement procedures, for administering medicines – refer to the *Administration of medication Policy* for further details. This includes systems for obtaining information about a child's needs for medicines, and for keeping this information up to date. Training is provided for staff where the administration of medicine requires medical or technical knowledge. Medicines must not usually be administered unless they have been prescribed for a child by a doctor, dentist, nurse or pharmacist (medicines containing aspirin should only be given if prescribed by a doctor).

Medicine (both prescription and non-prescription) must only be administered to a child where written permission for that particular medicine has been obtained from the child's parent and/or carer. We keep a written record each time a medicine is administered to a child and inform the child's parents and/or carers on the same day, or as soon as reasonably practicable.

## 18.WORKING WITH OTHER AGENCIES

South Cumbria Pupil Referral Service recognises and is committed to its responsibility to work with other professionals and agencies both to ensure children's needs are met and to protect them from harm. We will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.

New safeguarding partners and child death review partner arrangements came into place in September 2019. These will comprise of the local authority, a clinical commissioning group and the chief officer for police equally sharing responsibilities for working together to safeguard and promote the welfare of local children within each area. Safeguarding partners are expected to ensure schools are "fully engaged, involved and included in the new safeguarding arrangements" and it is expected that they will name schools and colleges as relevant agencies and if named schools will have a statutory duty to cooperate with the published arrangements.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from home or care;
- is missing education, or persistently absent from school, or not in receipt of fulltime education
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;

- has a parent/carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- is at risk of so-called 'honour'-based abuse such as Female genital Mutilation or forced marriage
- has returned home to their family from care;
- is a privately fostered child

South Cumbria PRU are committed to the Early Help Agenda and all key staff attend / can act as lead professional for Team Around the Child / Team Around the Family in relation to their key group. All staff have access to training opportunities to help them;

- To understand the Early Help process
- To effectively work together as a Multi-Agency Team
- To be able to confidently co-ordinate a TAC/TAF
- To be able to know and access assessment tools to measure risk and impact
- To be able to evidence the impact of Early Help for the child

The Service is not the investigating agency when there are child protection concerns and thus, we will pass all relevant cases to the statutory agencies, which we will support in undertaking their roles. Staff should understand that alongside this, the Service may have a crucial role in supporting the young person whilst investigations and assessments take place.

South Cumbria Pupil Referral Service recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family.

The Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

Support for the early help process can be accessed by talking to our leads staff, Megan Bland and Sara Rose.

## 19. CHILDREN AT RISK OF GREATER HARM

### 19.1 Statutory children's social care assessments and services (Child in Need and Child Protection Plans)

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

### 19.2 Children in need

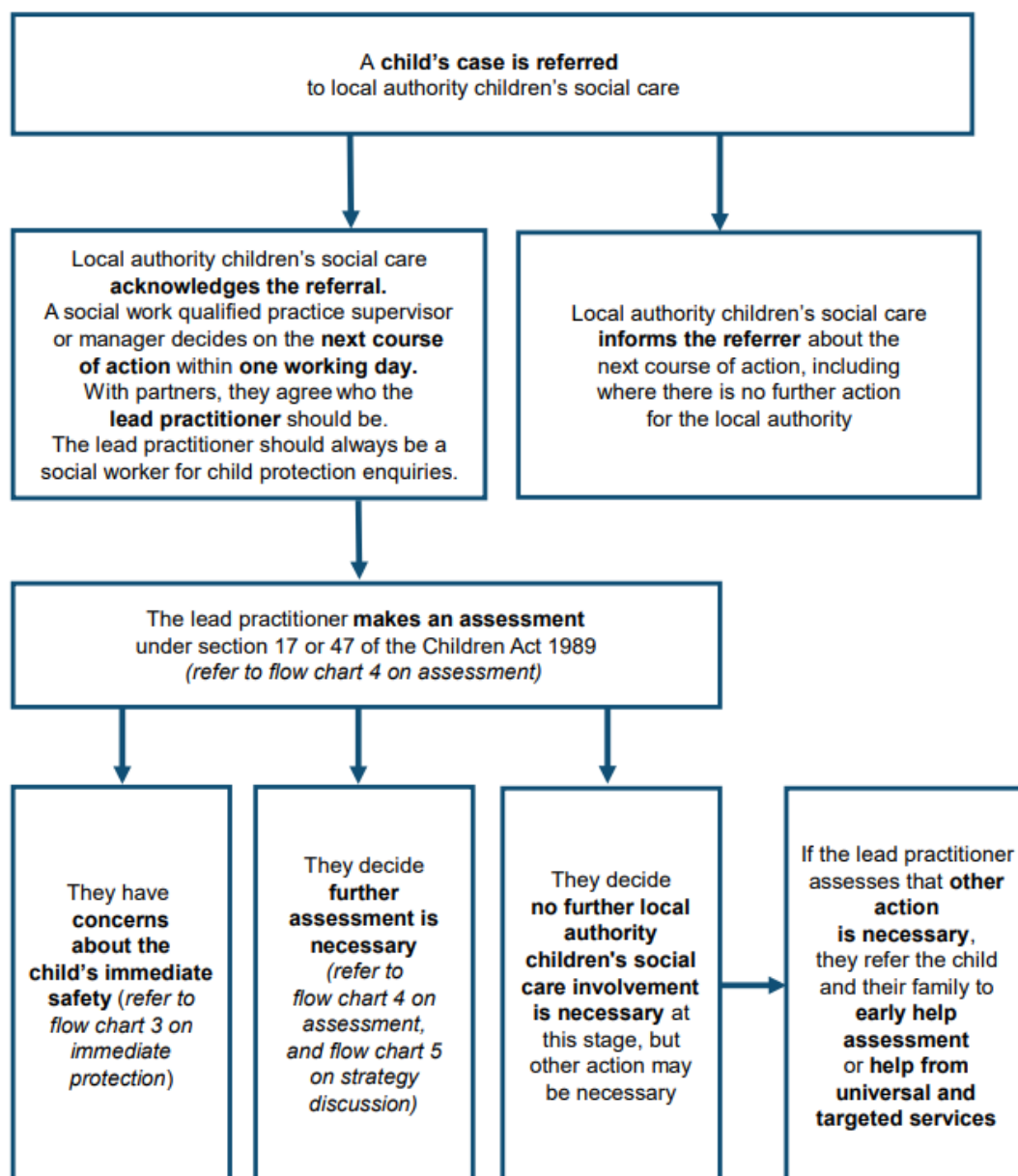
A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

## 19.3 Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and [exploitation](#), female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

## 19.4 What will the local authority do?

### Flow chart 1: Action taken when a child is referred to local authority children's social care



[Working together to Safeguard Children \(DfE, 2023\)](#)

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

## 19.5 Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

## 19.6 Children with special educational needs and disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The Management Committee should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO (David Smith)

## 19.7 Children who are lesbian, gay, bisexual or questioning their gender (LGBTQ+)

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

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 and/or attention deficit hyperactivity disorder.

It is 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, schools 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.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education curriculum](#) and there is a range of support available to help schools counter homophobic, biphobia and transphobic bullying and abuse.

## 19.8 Children requiring mental health support

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The Management Committee should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people. See [Better Health Every Mind Matters](#) for links to all materials and lesson plans

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the [Link Programme](#). Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health.

The School has a Senior Mental Health Lead (David Smith) and a Mental Health Champion (Dan Webber). The school is also supported by a Mental Health Worker in School from Barnardo's and a Counsellor (Sharon Harris).

## 19.9 Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Management Committee should ensure that staff have the skills, knowledge and understanding to keep looked after children safe. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Statutory guidance on [Promoting the education of looked-after and previously looked-after children](#) contains further information on the roles and responsibilities of virtual school heads. In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. [The role was further extended in September 2024 to include a non-statutory responsibility to promote the educational achievement of all children in kinship care](#)

Non-statutory guidance on [promoting the education of children with a social worker](#) contains further information on the roles and responsibilities of virtual school heads.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

## 19.10 Children absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent pupils and children with unexplainable and/or persistent absence from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child having unexplainable and/or persistent absence from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. [Further information and support, includes:](#)

- The department's [statutory guidance](#) on school attendance [Working together to improve school attendance](#) which [sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns](#).
- [Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.](#)

## 19.11 Elective Home Education (EHE)

Many home-educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we [will](#) coordinate a meeting with parents/carers [and other relevant professionals](#) where possible.

## 19.12 Homelessness Duty

The Homelessness Reduction Act 2017 significantly reformed England's homelessness legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness in their areas.

The duty to refer applies to all social services functions, including early help, leaving care and child protection; and is intended to increase early identification and intervention, which is critical for safeguarding against homelessness. Earlier intervention can help prevent children and young people becoming homeless, and the possibility of them being considered 'intentionally homeless' and so not owed a long-term housing duty.

Before making a referral, a public authority must:

- have consent to the referral from the individual
- allow the individual to identify the housing authority in England which they would like the notification to be made to and
- have consent from the individual that their contact details can be supplied so the housing authority can contact them regarding the referral

The referral to a housing authority must include the individual's name and contact details and the agreed reason for referral (e.g. that the individual is homeless or at risk of homelessness). Further referral information may include:

- whether an individual is already homeless, and if not when they are likely to become homeless
- whether the individual is at risk of rough sleeping on the date the referral is

made and if so whether this is imminent

- risk assessment information, considering risks to the individual and to others
- key medical information where relevant

Full guidance can be found in the [Homelessness Code of Guidance](#).

## 20. PARTNERSHIP WITH PARENTS

The Service shares a purpose with parents to educate and keep children safe from harm and to have their welfare promoted. We are committed to working with parents positively, openly and honestly.

We are in regular contact with parents and carers and use this to reinforce the importance of children being safe online. It is 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 or college (if anyone) their child is going to be interacting with online.

We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

On induction, the Safeguarding policy is shared with parents. Regular review meetings are held to discuss attendance, behaviour and welfare. All relevant documents are published on the school website and parents are directed to [www.southcumbriaap.org.uk](http://www.southcumbriaap.org.uk) to view relevant policies and procedures.

Staff will, in most circumstances endeavour to discuss all concerns with parents about their children. However, there may be exceptional circumstances when we will discuss concerns with Children's Services and/or the Police without parental knowledge. The Service will, of course, always aim to maintain a positive relationship with all parents. This Child Protection Policy is available on request.

A parental survey is undertaken to ensure that we gather feedback from our parents this includes asking whether they feel their child is being kept.

## 21. PROFESSIONAL CONFIDENTIALITY AND INFORMATION SHARING

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

Confidentiality is an issue which needs to be understood by all of those working with children, particularly in the context of Safeguarding. The only purpose of confidentiality, in this respect, is to the benefit of the child. Staff must never guarantee confidentiality to a student over matters of disclosure as information may have to be shared with others. Parents, governors and every adult working in, or associated with, the school will be advised of our approach to confidentiality and information sharing via our Privacy Notices and in terms of safeguarding will apply the 'seven golden rules to sharing information' (DfE; 2025). See also Appendix F.

Where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEND in a college, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

## The Seven golden rules for sharing information (including personal information):

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.
2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.
3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm
4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case
5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.
6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.
7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.

Professionals can only work together to Safeguard children if there is an exchange of relevant information. The school follows a 'need to know' policy and teachers and outside agencies will receive only information when the safety and welfare of the child necessitates that the information should be shared. Normally, personal information will only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998, European Convention on Human Rights, Article 8).

Wherever possible, consent will be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or in the best interest of the child. The safety and welfare of that child might necessitate that the information should be shared without informing or obtaining the consent of a parent. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and advice should be sought if in doubt.

If parents and/or the child do not consent to an early help assessment, then the DSL should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral into local authority children's social care may be necessary.

The flowchart in Appendix F taken from "Advice for practitioners providing safeguarding services to children, young people, parents and carers" March 2015 acts as guide to help assess whether or not information should be shared and who with. If in any doubt, the DSL can seek advice from the Cumbria Local Safeguarding Children Board or Children's Services Customer Advisor(s) on 0333 240 1727.

All staff should remain aware that they cannot keep 'secrets' and absolute confidentiality with children, and that if children disclose abuse or give information that suggests they may be unsafe, this MUST be passed on to the DSL as soon as possible. The child should be told who their allegation will be shared with and what will happen next.

## 22. CURRICULUM AND STAYING SAFE

The Service plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

The Management Committee should ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific

needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

We feel we play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The school have a clear set of values and standards, upheld and demonstrated throughout all aspects of school. These are underpinned by the school's relationships and behaviour regulation policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). We use the Medway program which addresses learning at age-appropriate stages issues such as:

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

The DfE has produced a one-stop hub for teachers which can be [accessed here](#). There are also many resources listed in [KCSIE](#) (2025) that can help schools understand and teach about safeguarding.

South Cumbria Pupil Referral Service will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others. Systems have been established to support the empowerment of children to talk to a range of staff when they are in difficulty and to raise comments, complaints and feedback about their educational experiences. Young people at South Cumbria Pupil Referral Service will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate. Records will be kept of reported incidents in line with guidance.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

## 22.1 ONLINE SAFETY

The breadth of issues classified within online safety is considerable, but can be categorised into 4 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 and 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:** personal 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 or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

We ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement. See also [Teaching online safety in schools, DfE Jan 2022](#), [Education for a Connected World, DfE Feb 2018](#) and [Project EVOLVE \(online Toolkit\)](#) for guidance, support and resources.

## 22.2 FILTERING & MONITORING

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Management Committee should be doing all that they reasonably can to limit children's exposure to risks from the school's IT system. As part of this process, the Management Committee should ensure their school has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Management Committee should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the [Prevent Duty](#).

The Department for Education [filtering and monitoring standards](#) set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs
- schools can use the department's '[plan technology for your school service](#)' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

The Management Committee should review the standards and discuss with IT staff and service providers what more needs to be done to support in meeting this standard. See our Online Safety Policy and Cyber Security Resilience Strategy for more detail on this. [Additional guidance on filtering and monitoring can be found at:](#)

Additional guidance on "appropriate" filtering and monitoring can be found at:

- UK Safer Internet Centre: [Appropriate filtering and monitoring](#). The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be accessed at [Filtering and monitoring webinars available – UK Safer Internet Centre](#).
- South West Grid for Learning ([swgfl.org.uk](#)) has created a [tool](#) to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).
- Support for schools when considering what to buy and how to buy it is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).
- The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

## 22.3 INFORMATION SECURITY & ACCESS MANAGEMENT

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the [National Education Network](#). In addition, schools and colleges should consider [taking appropriate action](#) to meet the [Cyber security standards for schools and colleges.GOV.UK](#) which were developed to help them improve their resilience against cyber-attacks. Broader guidance on cyber security including considerations for governors and trustees can be found at [Cyber security training for school staff - NCSC.GOV.UK](#).

## 22.4 RELATIONSHIPS, SEX & HEALTH EDUCATION

The Government made regulations which will make the subjects of Relationship Education (primary schools) and Relationships, Sex and Health (Secondary) Education mandatory from September 2021.

This RSHE policy has been developed in consultation with staff, pupils and parents. The consultation and policy development process involved the following steps:

- Review –all relevant information including relevant national and local guidance was analysed.
- Staff consultation – all school staff were given the opportunity to look at the policy and the RSHE curriculum and make recommendations.
- Parent/stakeholder consultation – parents and any interested parties were asked to complete a questionnaire and invited to ask any questions about our new RSHE curriculum. A letter was sent out and information displayed at an open afternoon to gain feedback from parents.
- Pupil consultation – we gave students the opportunity to tell us what they want from to learn about in their RSHE lessons. Students put forward their thoughts and ideas have put together a programme of study to incorporate each area identified.
- Policy received ratification – once amendments were made by the Management Committee.

We use the Medway program, and 15 staff have been fully trained in delivering this program to ensure that all students feel safe and comfortable with content and delivery.

Information for students is displayed around the centre to signpost young people to appropriate support and promote a strong safeguarding culture.

The statutory guidance can be found here:

[Statutory guidance: relationships education relationships and sex education \(RSE\) and health education.](#)

The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

## 23.SUPERVISION AND SUPPORT

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

All staff have a line manager with whom they can discuss concerns including the area of child protection; however, all concerns MUST be reported to the DSL without delay. Early Careers Teachers also have an assigned mentor.

The DSL can put staff and parents in touch with outside agencies for professional support if they so wish and one to one supervision is offered to staff. All staff receive group peer supervision throughout the year facilitated via the CPD programme.

Effective supervision provides support, coaching and training for the staff member/volunteer and promotes the interests of children. Supervision should foster a culture of mutual support, teamwork and continuous improvement which encourages the confidential discussion of sensitive issues. Supervision should provide opportunities for staff to:

- discuss any issues – particularly concerning the development or well-being of young people;
- identify solutions to address issues as they arise; and
- receive coaching to improve their personal effectiveness.

The DSL or relevant key teacher attends the Early Help panels and is able to access support and advice and share concerns re 'stuck' cases.

In addition, all staff have the opportunity contribute to the weekly Safeguarding Team meetings as well as SEND and Pastoral meetings where concerns will be discussed, and actions made.

## 24. SAFE WORKING PRACTICE

Staff are required to work within clear Guidelines on Safe Working Practice / the Service's Code of Conduct.

Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all Service staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

### 24.1 Staff Conduct

The following guidelines apply to all staff working in the South Cumbria Pupil Referral Service whether acting in a paid or unpaid capacity:

- Always avoid unnecessary physical contact with a student.
- Carry out a risk assessment process before taking a student alone in a car, however short the journey.
- Do not divulge personal contact details such as e-mail address or telephone number.
- Do not make suggestive or inappropriate remarks to or about a student, even in fun, as this could be misinterpreted.

Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff should be aware of the *Relationships and Behaviour Regulation Policy*, and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided. Full advice and guidance can be found in the [DfE Use of Reasonable Force](#)

### 24.2 ONLINE SAFETY, USE OF MOBILE PHONES AND CAMERAS

It is recognised that the use of new technologies presents particular challenges and risks to children both inside and outside of the Service. South Cumbria Pupil Referral Service will ensure a comprehensive curriculum response to enable all students to learn about and manage the associated risks effectively and will support parents and the Service community (including all members of staff) to become aware and alert to the needs of keeping children safe online. Detailed information can be found in the Online Safety & Cybersecurity Policy, Images in Schools policy and Relationships and Behaviour Regulation Policy which can be found in the [Policies file in the shared network drive](#).

## 25.COMPLAINTS

The Service has a *Complaints Procedure* available to parents, students and staff who wish to report concerns. This can be found in the Policies file in the shared network drive.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific *Procedures for Managing Allegations Against Staff* - see Section 14.

## 26.SAFER RECRUITMENT

South Cumbria Pupil Referral Service is committed to ensuring that all steps are taken to recruit staff and volunteers who are safe to work with our students and have their welfare and protection as the highest priority. The Management Committee and Leadership Team are responsible for ensuring that the Service follows safe recruitment processes outlined within Guidance, including accurate maintenance of the Single Central Record; and an application, vetting and recruitment process which places safeguarding at its Service, regardless of employee or voluntary role in line with Part 3 of the [DfE document 'Keeping Children Safe in Education' \(2025\)](#).

We ensure that all appropriate measures are applied in relation to everyone who works in the Service and who is therefore likely to be perceived by the students as a safe and trustworthy adult. This includes members of the Management Committee/volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

In line with statutory changes, underpinned by regulations, the following will apply:

- A DBS Enhanced (with Children's Vetting and barring) Disclosure is obtained for all new appointments to our Service's workforce (for types of DBS [see KCSIE 2025](#));
- An Enhanced DBS (with Children's Vetting and Barring) certificate will be obtained for volunteers when they work unsupervised or where volunteers are more frequent (once per week, every week) or intensive (four or more times in a 30-day period or overnight);
- Existing volunteers and parents who only accompany staff and children on one off outing or trips that do not involve overnight stays, or who help at specific one off events such as sports day, do not require a DBS certificate, but will NEVER be given unsupervised access to children;
- This Service is committed to keeping an up-to-date Single Central Record detailing a range of checks carried out on our staff;
- All new appointments to our workforce who have lived outside the UK will be subject to additional checks as appropriate;
- Our Service ensures that supply staff have undergone the necessary checks and will be made aware of this policy;
- Identity checks that must be carried out on all appointments to our workforce before the appointment is made, in partnership with the Local Authority (LA).

All posts involving direct contact with children are exempt from Rehabilitation of Offenders Act 1974. However, amendments to the Exceptions Order 1975 (2013 & 2020) provide that certain spent convictions and cautions are 'protected'. These are not subject to disclosure to employers and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found on the Ministry of Justice website or [here](#).

The Management Committee will ensure that at least two appropriate members of the leadership team complete accredited Safer Recruitment Training in line with NSCL/CWDC requirements. There will always be at least one member of every interviewing panel who has completed Safer Recruitment training which must be refreshed at least every 3 years.

As maintained school Management Committee members are only required to have an enhanced criminal record certificate from the DBS, which does not include a barred list check (unless in addition to their Management Committee duties they also engage in regulated activity).

When appointing new staff, schools and colleges must:

- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website;
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity);
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on [GOV.UK](https://www.gov.uk);
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate;
- verify professional qualifications, as appropriate.
- The Teacher Services' system will be used to check for prohibitions to teaching. [Further information about the duty to consider referring to the Teaching Regulation Agency \(TRA\) can be found at paragraphs 354-355.](#)
- In addition, as part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. The school will inform shortlisted candidates that online searches will be carried out.

## 27. REFERRAL TO THE DBS

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

The Management Committee should ensure there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.

Concerns including allegations that may meet the harms test should be addressed as set out in Part four of Keeping Children safe in Education.

For most cases, the DBS only has the power to bar a person who is, has been or might in future engage in regulated activity.

The advice of the LADO can also be sought if there is uncertainty as to whether a referral should be made or for example there are concerns about the staff members conduct outside work which may raise concerns about their suitability to work with children. Further guidance can be found on the [Cumbria CSCP website](#)

See also Appendix G

## 28. THE USE OF SERVICE PREMISES BY OTHER ORGANISATIONS

Where the Management Committee or Headteacher hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe. The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

When services or activities are provided by the Management Committee or Headteacher, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The Management Committee or Headteacher should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The Management Committee or Headteacher should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

## 29. SAFETY AND SUITABILITY OF PREMISES, ENVIRONMENT AND EQUIPMENT

We will ensure that our premises, including outdoor spaces, are fit for purpose. Spaces, furniture, equipment and toys, must be safe for children to use and premises must be secure. We will keep premises and equipment clean, and be aware of, and comply with, requirements of health and safety legislation (including hygiene requirements). We have, and implement, a *Health and Safety Policy*, and procedures, which cover identifying, reporting and dealing with accidents, hazards and faulty equipment.

We will take reasonable steps to ensure the safety of children, staff and others on the premises in the case of fire or any other emergency and have an emergency evacuation procedure. We must have appropriate fire detection and control equipment (for example, fire alarms, smoke detectors, and fire extinguishers) which is in working order. Fire exits are clearly identifiable, and fire doors are kept free of obstruction and are easily opened from the inside.

We operate a strict no smoking policy, which prevents smoking in a room, or outside play area, when children are present or about to be present.

We have a clear and well-understood policy, and procedures, for assessing any risks to children's safety, and review risk assessments regularly. Risk assessments inform staff practice and demonstrate how we are managing risks. Risk assessments identify aspects of the environment that need to be checked on a regular basis, when and by whom those aspects will be checked, and how the risk will be removed or minimised.

Children must be kept safe while on outings, and we obtain written parental permission for children to take part in outings. We assess the risks or hazards which may arise for the children, and identify the steps to be taken to remove, minimise and manage those risks and hazards. The assessment includes consideration of adult to child ratios. We consider what additional measures are necessary when children stay overnight. Refer to the *Service Educational Visits Procedures* for further details.

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole community ethos and welcome comments from students, parents and others about areas that may need improvement as well as what we are doing well.

We will take all reasonable steps to prevent unauthorised persons entering the premises. Appropriate checks will be undertaken in respect of visitors and volunteers coming into the Service as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on the Service site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

The Service will not accept the behaviour of any individual (parent or other) that threatens Service security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may involve the Police and/or result in a decision to refuse access for that individual to the Service site.

## 30.COMMISSIONING ALTERNATIVE PROVISION

Good Alternative Provision (AP) should identify and meet the needs of the individual. At South Cumbria PRU we commission AP to help a student overcome barriers to learning, improve motivation and self-confidence and improve attendance and engagement.

Many of the students placed will be vulnerable and it is paramount that good safeguarding practices are in place to protect them. When a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil. The Department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

- [Alternative provision - DfE Statutory Guidance](#); and
- [Education for children with health needs who cannot attend school - DfE Statutory Guidance](#)

### 30.1 Alternative Provision

All providers undergo an initial assessment 'Checklist for Alternative Providers'. This checklist assesses aspects of the AP which are relevant to the Health, Safety and Welfare of the students placed there.

Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Once an AP has been approved and it is known all aspects of our assessment are met the provider will be asked to complete the 'Agreement for the Placement of Learners in Alternative Education' which outlines expectations of their provision and of the PRU. A 'Student Risk Assessment' will be completed and shared with the provider. We share our Policy with the provider and discuss our procedures and expectations. Before a student attends any AP a four-way agreement has been signed the agreement is between the school, the student, the provider and the parent; this ensure that all parties are confident and aware of all aspects of the provision.

During the placement the student's attendance will be monitored each session and provision will frequently be monitored by the PRU staff to ensure the placement is continually quality assured and in order to monitor the outcomes of the student. The 'Student Placement Monitoring Form' will be completed on all visits and for all calls that are made.

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make.

Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

### 30.2 Extended Work Experience

In order to ensure our work placements for students provide a safe environment the PRU have a Service Level Agreement with Cumbria Education Business Partnership (CEBP). Placements are sought internally by

our own staff who are able to assess the needs of the student and work in collaboration with potential work placement providers before CEBP carry out a risk assessment of the workplace.

During the experience the student's attendance will be monitored each session and provision will frequently be monitored by the PRU staff to ensure the placement is continually quality assured and in order to monitor the outcomes of the student. The 'Student Placement Monitoring Form' will be completed on all visits and for all calls that are made. All students are frequently monitored.

## 31.MONITORING AND REVIEW

Safeguarding including child protection is a regular agenda item at full Management Committee meetings and staff meetings, giving the Designated Safeguarding Lead and Designated member of the Management Committee the opportunity to update on staff/governor training and any other relevant issues or changes.

The Child Protection Policy is reviewed annually by the Management Committee to reflect current best practice and any new guidelines issued by Government or relevant agencies.

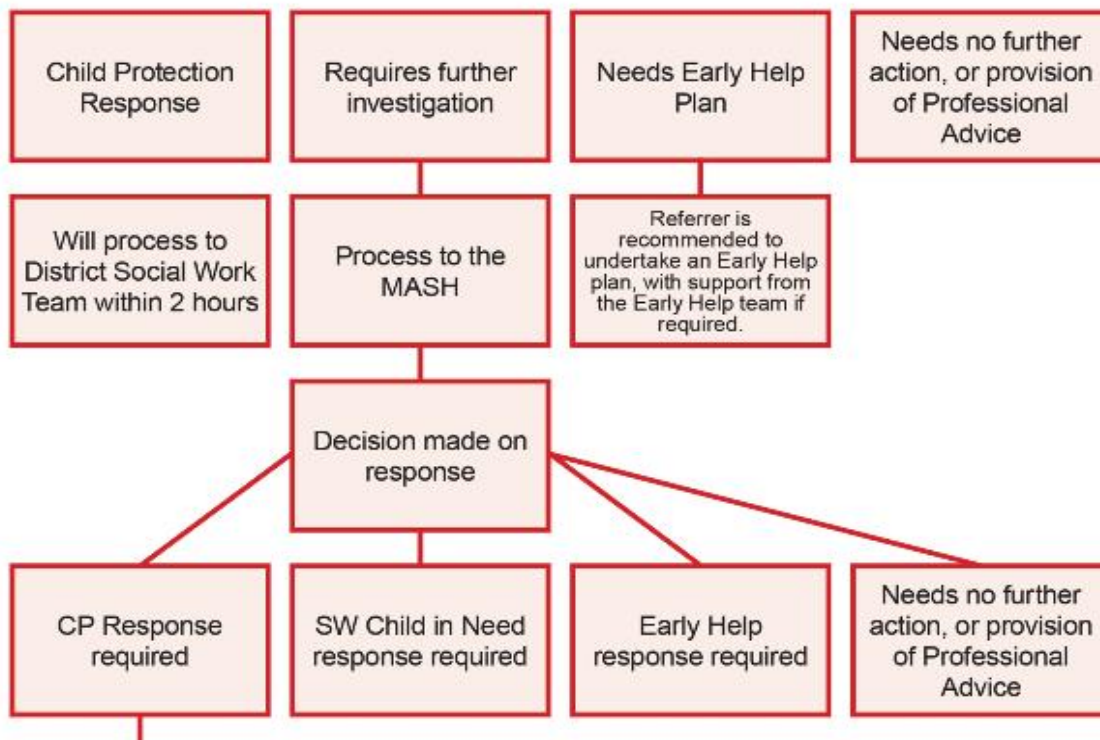
# Contacting Cumbria Safeguarding Hub

## Consider

Does this child need an immediate child protection response if so continue to report your concern to the Hub. **IF NOT:**

- Could this child be helped by an Early Help Plan?
- Can I identify other professionals to contribute to an Early Help Plan ?
- If so please seek support from your own service advisor or the Early Help Team to work with the family to prevent escalation of need.

Unless your contact requires an immediate child protection response the Hub will ask you about the recent Early Help Plan and Team around the child meetings and will make a decision about the level of vulnerability. This will be either:



We trust you will be part of an agreed outcome in line with the Cumbria Threshold Guidance. Where decision have been made following the Hub episode we will provide feedback on the destination of your contact via email or letter. However you are also responsible for knowing what has happened to your concern, so if you have not had any feedback within 72hrs you MUST contact the Hub and ask.

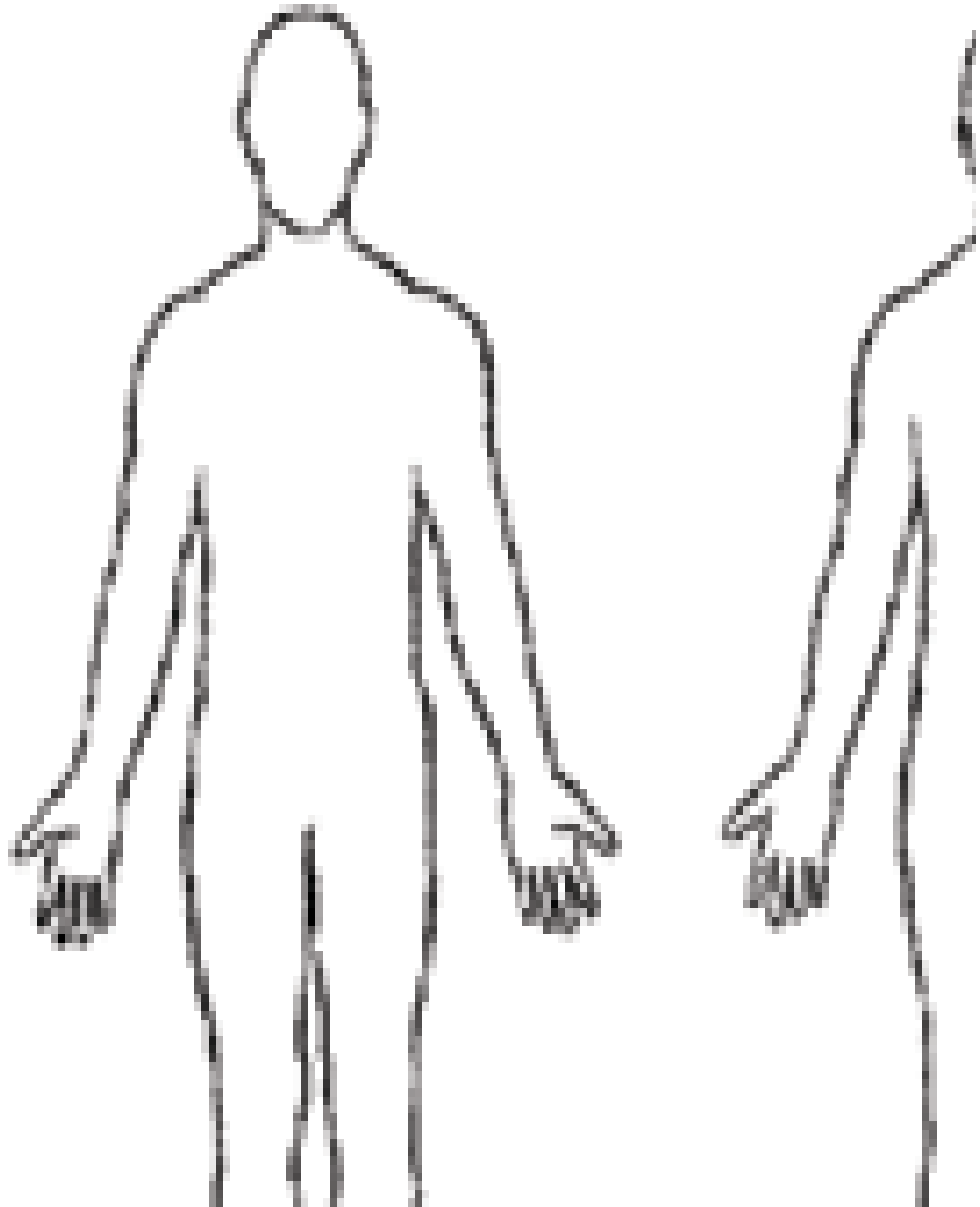
Appendix B Allegations Management Procedures

[CSCP Summary of Allegations Management Procedures](#)

[Employers Leaflet](#)

## BODY MAP

*To be used (where appropriate) with Child Disclosure/Concern Record*



## Protecting Yourself

Don't...

- instigate verbal or physical contact with pupils (this applies both on and off site) unless it is appropriate and a part of an agreed reason for your visit.
- respond to verbal or physical contact from pupils. If this occurs, or you have any other concerns about pupil behaviour then report it immediately to a member of staff or to someone in the school office.
- give any personal information to any pupil, for example your name, address, telephone or mobile number or email address, this includes access to your social networking site.
- accept or respond to a pupil attempting to give you personal information, for example their name, address, telephone or mobile number, email address or access to a social networking site.
- accept physical or verbal abuse from a pupil. DO NOT respond yourself, but report it immediately to a member of staff or to someone in the school office.

remember not to:

- \* believe it could never happen to me
- \* permit abusive peer activities
- \* jump to conclusions without establishing facts
- \* make suggestive comments
- \* allow access to school site to persons unknown or uninvited
- \* ask leading questions.

**Accountable**  
**WeResilient**  
**Empathetic**

If you see something you are unsure of, ask to speak to one of the Safeguarding Team, during or immediately after your visit



**LADO (Local Authority Designated Officer) for Westmorland & Furness**

[lado@westmorlandandfurness.gov.uk](mailto:lado@westmorlandandfurness.gov.uk)

Tel 0300 303 3897

Amanda Quirke Team Manager,  
[Amanda.Quirke@westmorlandandfurness.gov.uk](mailto:Amanda.Quirke@westmorlandandfurness.gov.uk)  
Laura Cross LADO,  
Peter Goulston LADO Assistant.

Further advice from  
**Cumbria Safeguarding Children Partnership**

<https://www.cumbriasafeguardingchildren.co.uk/>

 [www.southcumbriaap.org.uk](http://www.southcumbriaap.org.uk)

 01229 407470

Building bridges to a brighter future  
**SOUTH CUMBRIA**  
PUPIL REFERRAL SERVICE

**Safeguarding information for adults visiting or working at Newbridge House**



Newbridge House, Ewan Close  
Barrow in Furness, Cumbria.

LA13 9HU

/// dance.asleep.pulse

## Our Designated Safeguarding Leads:



**Lisa Balderstone**  
Headteacher & DSL



**Jez Mark**  
Safeguarding & Family  
Liaison Officer, DDSL



**Leeann Evans**  
School Business Leader,  
DDSL



**Sara Rose**  
Assistant SENCO & KS2  
Lead, DDSL



**Megan Bland**  
Early Help Lead,  
Domestic Abuse  
Champion, DDSL

## Do:

- Wear your visitors pass at all times
- Treat everyone with respect
- Be a positive example to others in your conduct
- Recognise and allow for the needs of others
- respect sexual orientation, cultural, religious & ethnic backgrounds of others
- Be aware of evacuation procedures
- Remain professionally curious
- Use appropriate language

### Safeguarding means:

Protecting children from abuse and maltreatment... ensuring they grow up with safe and effective provision of care. Taking action to enable all children and young people have the best outcomes.

### Advice if a child discloses a safeguarding issue to you:

- Stay calm and controlled
- Be Prepared to listen
- Alleviate feelings of guilt and isolation, whilst passing no judgement.
- Do not show revulsion or distress or make any promises.
- Advise that you will try to offer support, but you **must pass information** to someone whose job it is to keep them safe.
- Do not discuss the disclosure with anyone outside the school.
- After the disclosure, tell one of our Designated Safeguarding Leads immediately.

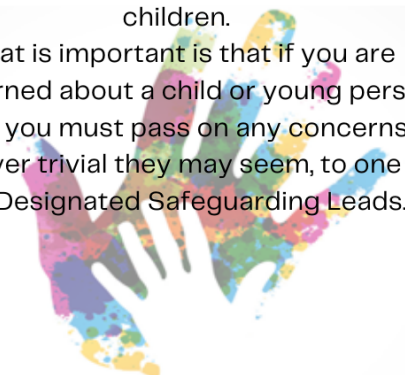
## Our Role

The Management Committee and staff of South Cumbria Pupil Referral Service take seriously our responsibility to safeguard and promote the welfare of our pupils, to minimise risk and to work together with other agencies to ensure adequate arrangements are in place within our school to identify, assess, and support those children who are suffering harm and to keep them safe and secure whilst in our care

Everyone who works with children has a responsibility for keeping them safe. No single professional can have a full picture of a child's needs and circumstances and, if children are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

You should not let other considerations, like fear of damaging relationships with adults, get in the way of safeguarding children.

What is important is that if you are concerned about a child or young person then you must pass on any concerns, however trivial they may seem, to one of our Designated Safeguarding Leads.



## Appendix E – Questioning Skills:

To avoid leading questions when clarifying what a child has said, you should use open questions with a child rather than closed questions.

The following gives some examples of both:

Closed Questions	Open Questions
Do	Tell me
Did	Explain to me
Can	Describe to me
Would	Who
Could	What
Are	When
	Where
	How

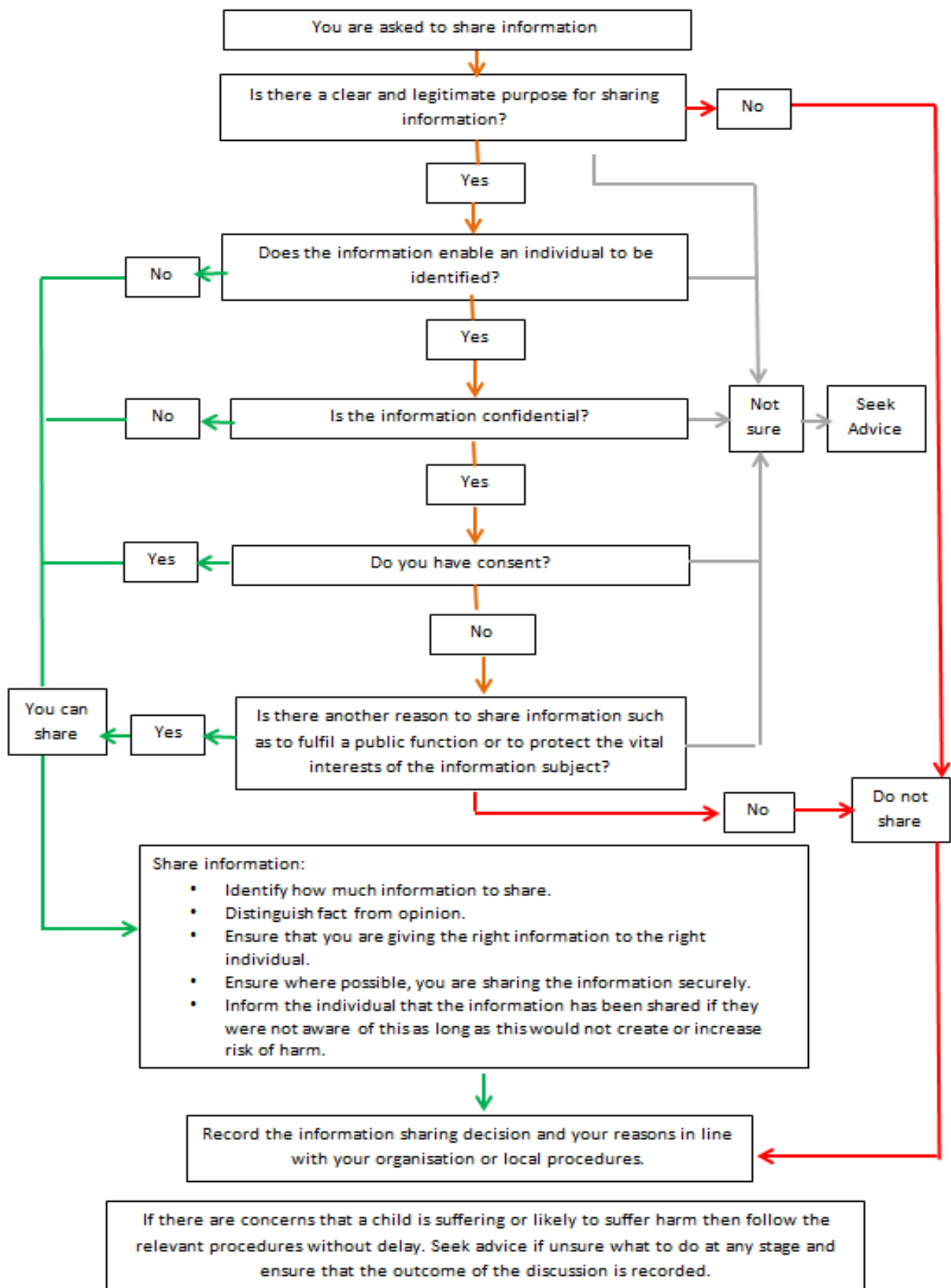
Avoid using 'Why'? This can confuse a child and leads to feelings of guilt.

### Initial Responses to child

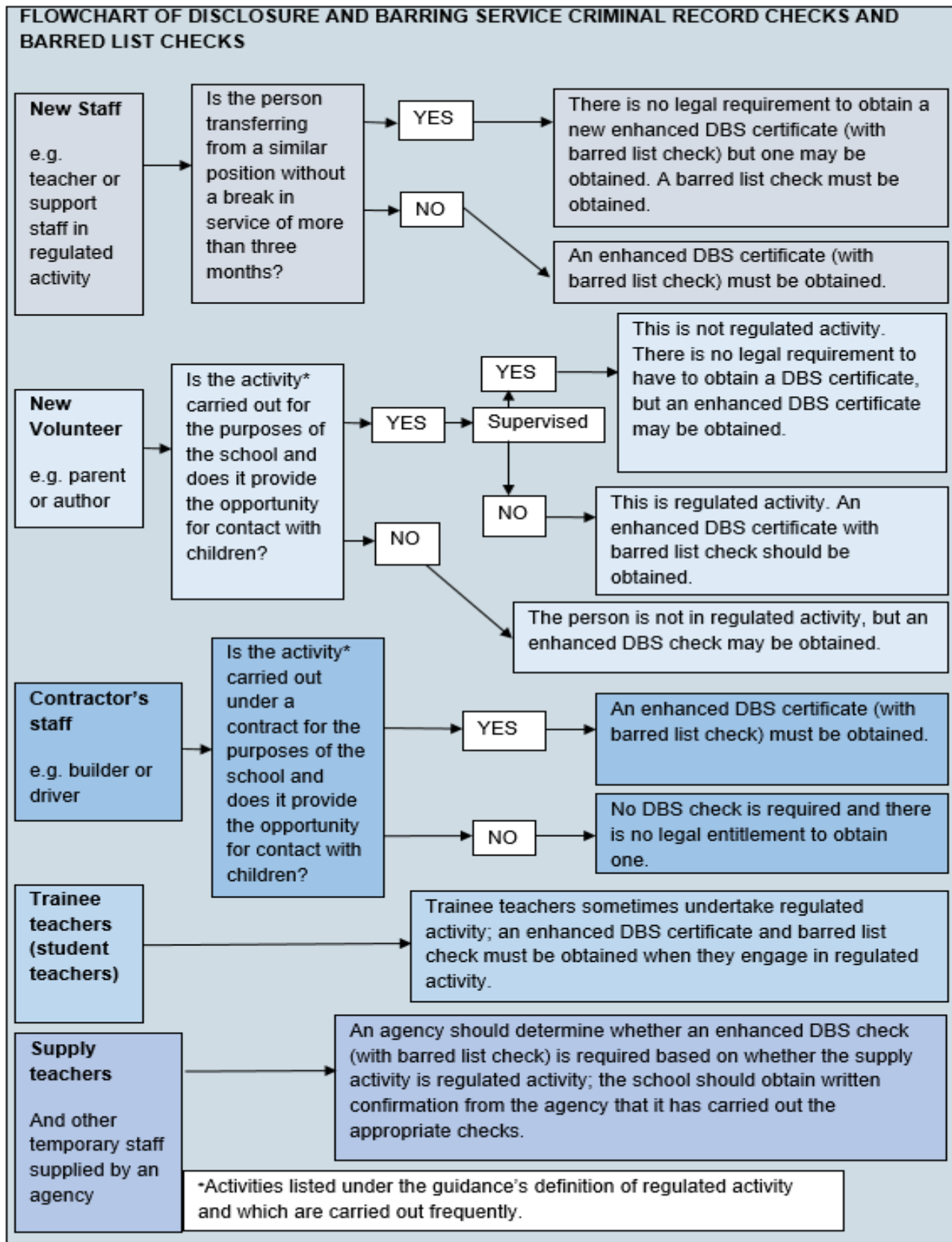
When a child has made a disclosure, it can be a relief for them, however they are likely to feel vulnerable and confused. Here are some examples of what can be said to a child;

You Can say:	Do not say:
'Thank you for telling me'	'It will be all right soon'
'I am sorry it has happened to you'	Anything which you will not be able to fulfil
'I am going to help you, and will tell you what I am going to do'	It is anybody's fault
'It should not have happened'	
'You are not to blame'	

## Appendix F: Flowchart of when and how to share information



## Appendix G – DBS Criminal Records checks and Barred list checks



# Appendix H - Safeguarding Passengers on Council Transport

[Safeguarding Children and Adults at Risk \(cumbria.gov.uk\)](http://cumbria.gov.uk)

## Appendix I – Additional advice and support

There is a wealth of information available to support schools and colleges. The following list is not exhaustive but should provide a useful starting point: Abuse Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to [concerns of child sexual abuse and abusive behaviours](#).

[What to do if you're worried a child is being abused](#) – DfE advice

[Domestic abuse: Various Information/Guidance](#) – Home Office advice

[Faith based abuse: National Action Plan](#) – DfE advice

[Forced marriage resource pack](#)

[Disrespect NoBody campaign – GOV.UK](#) – Home Office website

[Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper

[Together we can stop child sexual abuse](#) – HM Government campaign

Bullying

[Preventing bullying including cyberbullying](#) – DfE advice

Children missing from education, home or care

[Children missing education](#) – DfE statutory guidance

[Children who run away or go missing from home or care](#) – DfE statutory guidance

[Missing Children and Adults strategy](#) – Home Office strategy

Children with family members in prison

[National Information Centre on Children of Offenders](#) – Barnardo's in partnership with HM Prison and Probation Service

Child exploitation

[Safeguarding children who may have been trafficked](#) – DfE and Home Office guidance

[Care of unaccompanied migrant children and child victims of modern slavery](#) – DfE statutory guidance

[Modern slavery: how to identify and support victims](#) – HO statutory guidance

[Child exploitation disruption toolkit](#) – HO statutory guidance

[Preventing Child Sexual Exploitation](#) – The Children's Society and Home Office

[County Lines Toolkit For Professionals](#) – The Children's Society in partnership with Victim Support and National Police Chiefs' Council

[Multi-agency practice principles for responding to child exploitation and extra-familial harm](#) – Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the

Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

## Confidentiality

[Gillick competency Fraser guidelines](#) – Guidelines to help with balancing children's rights along with safeguarding responsibilities.

## Drugs

[From harm to hope: A 10-year drugs plan to cut crime and save lives](#) – Home Office strategy

[Honest information about drugs](#) – Talk to Frank website

[Drug and Alcohol education – teacher guidance & evidence review](#) – PSHE Association

(So-called) 'honour'-based abuse, including FGM and forced marriage

[Female genital mutilation: information and resources](#) – Home Office guidance

[Female genital mutilation: multi agency statutory guidance](#) – DfE, Department for Health, and Home Office

[Forced marriage](#) – Forced Marriage Unit (FMU) resources

[Forced marriage](#) – Government multi-agency practice guidelines and multi-agency statutory guidance

[FGM resource pack](#) – HM Government guidance

## Health and well-being

[Rise Above: Free PSHE resources on health, wellbeing and resilience](#) – Public Health England

[Supporting pupils at schools with medical conditions](#) – DfE statutory guidance

[Mental health and behaviour in schools](#) – DfE advice

[Overview - Fabricated or induced illness](#) – NHS advice

## Homelessness

[Homelessness code of guidance for local authorities](#) – Department for Levelling Up, Housing and Communities guidance

## Information sharing

[Government information sharing advice](#) – Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

[Information Commissioner's Office: Data sharing information hub](#) – Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

## Online safety advice

[Childnet](#) – Provides guidance for schools on cyberbullying

[Educateagainsthate](#) – Provides practical advice and support on protecting children from extremism and radicalisation

[London Grid for Learning](#) – Provides advice on all aspects of a school or college's online safety arrangements

[NSPCC E-safety for schools](#) – Provides advice, templates, and tools on all aspects of a school or college's online safety arrangements

[Safer recruitment consortium](#) – 'Guidance for safe working practice', which may help ensure staff behaviour policies are robust and effective

[Searching screening and confiscation](#) – Departmental advice for schools on searching children and confiscating items such as mobile phones

[South West Grid for Learning](#) – Provides advice on all aspects of a school or college's online safety arrangements

[Use of social media for online radicalisation](#) – A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

[Online Safety Audit Tool](#) – From UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring

[Online safety guidance if you own or manage an online platform](#) – DCMS advice

[A business guide for protecting children on your online platform](#) – DCMS advice

[UK Safer Internet Centre](#) – Provides tips, advice, guides and other resources to help keep children safe online

Online safety relating to remote education, virtual lessons and live streaming

[Guidance Get help with remote education](#) – Resources and support for teachers and school leaders on educating pupils and students

[Departmental guidance on safeguarding and remote education](#) – Including planning remote education strategies and teaching remotely

[London Grid for Learning](#) – Guidance, including platform-specific advice

[National Cyber Security Centre](#) – Guidance on choosing, configuring and deploying video conferencing

[UK Safer Internet Centre](#) – Guidance on safe remote learning

Online safety – support for children

[Childline](#) – For free and confidential advice

[UK Safer Internet Centre](#) – To report and remove harmful online content

[CEOP](#) – For advice on making a report about online abuse

Online safety- parental support

[Childnet](#) – Offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

[Commonsensemedia](#) – Provides independent reviews, age ratings, & other information about all types of media for children and their parents

[Government advice](#) – About protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

[Internet Matters](#) – Provides age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world

[How Can I Help My Child?](#) – Marie Collins Foundation – Sexual abuse online

[London Grid for Learning](#) – Provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) – Can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

[National Crime Agency/CEOP Thinkuknow](#) – Provides support for parents and carers to keep their children safe online

[Parentzone](#) – Provides help for parents and carers on how to keep their children safe online

[Talking to your child about online sexual harassment: A guide for parents](#) – This is the Children's Commissioner's parental guide on talking to their children about online sexual harassment

Private fostering

[Private fostering: local authorities](#) – DfE statutory guidance

Radicalisation

[Prevent duty guidance](#) – Home Office guidance

[Prevent duty: additional advice for schools and childcare providers](#) – DfE advice

[Educate Against Hate website](#) – DfE and Home Office guidance

[Prevent for FE and Training](#) – Education and Training Foundation (ETF)

[Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid for Learning

[Managing risk of radicalisation in your education setting](#) – DfE advice

Serious violence

[Serious violence strategy](#) – Home Office strategy

[Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office

[Youth Endowment Fund](#) – Home Office

[Gangs and youth violence: for schools and colleges](#) – Home Office advice

[Tackling and girls strategy](#) – Home Office strategy

[Violence against women and girls: national statement of expectations for victims](#) – Home Office guidance

Sexual violence and sexual harassment

Specialist organisations

[Barnardo's](#) – UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

[Lucy Faithfull Foundation](#) – UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

[Marie Collins Foundation](#) – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

[NSPCC](#) – Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

[Rape Crisis](#) – National charity and the umbrella body for their network of independent member Rape Crisis Centres.

[UK Safer Internet Centre](#) – Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful sexual behaviour

[Rape Crisis \(England & Wales\)](#) or [The Survivors Trust](#) – For information, advice, and details of local specialist sexual violence organisations.

[NICE guidance](#) – Contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

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

The Lucy Faithfull Foundation also run [shorespace.org.uk](#) which provides a safe and anonymous place for young people to get help and support to prevent harmful sexual behaviours.

[NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#) – Free and independent advice about HSB.

[Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) – Provides a school self assessment toolkit and guidance for addressing HSB in schools.

[Preventing harmful sexual behaviour in children - Stop It Now](#) – Provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Support for victims

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

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

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

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

[Childline](#) – Provides free and confidential advice for children and young people.

## Toolkits

[NSPCC](#) – Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

[NSPCC](#) – Resources which help adults respond to children disclosing abuse.

NSPCC also provide free and independent advice about HSB: [NSPCC - Harmful sexual behaviour framework](#)

[Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#) – Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

[Contextual Safeguarding Network](#) – Self-assessment toolkit for schools to assess their own response to HSB and levers for addressing HSB in schools.

[Childnet - STAR SEND Toolkit](#) – Equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities (SEND).

[Childnet - Just a joke?](#) – Provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

[Childnet - Step Up, Speak Up](#) – A practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

[NSPCC - Harmful sexual behaviour framework](#) – An evidence-informed framework for children and young people displaying HSB.

Farrer & Co: [Addressing child on child abuse: a resource for schools and colleges](#) – This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.

## Sharing nudes and semi-nudes

[London Grid for Learning-collection of advice](#) – Various information and resources dealing with the sharing of nudes and semi-nudes.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) – Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

## Support for parents/carers

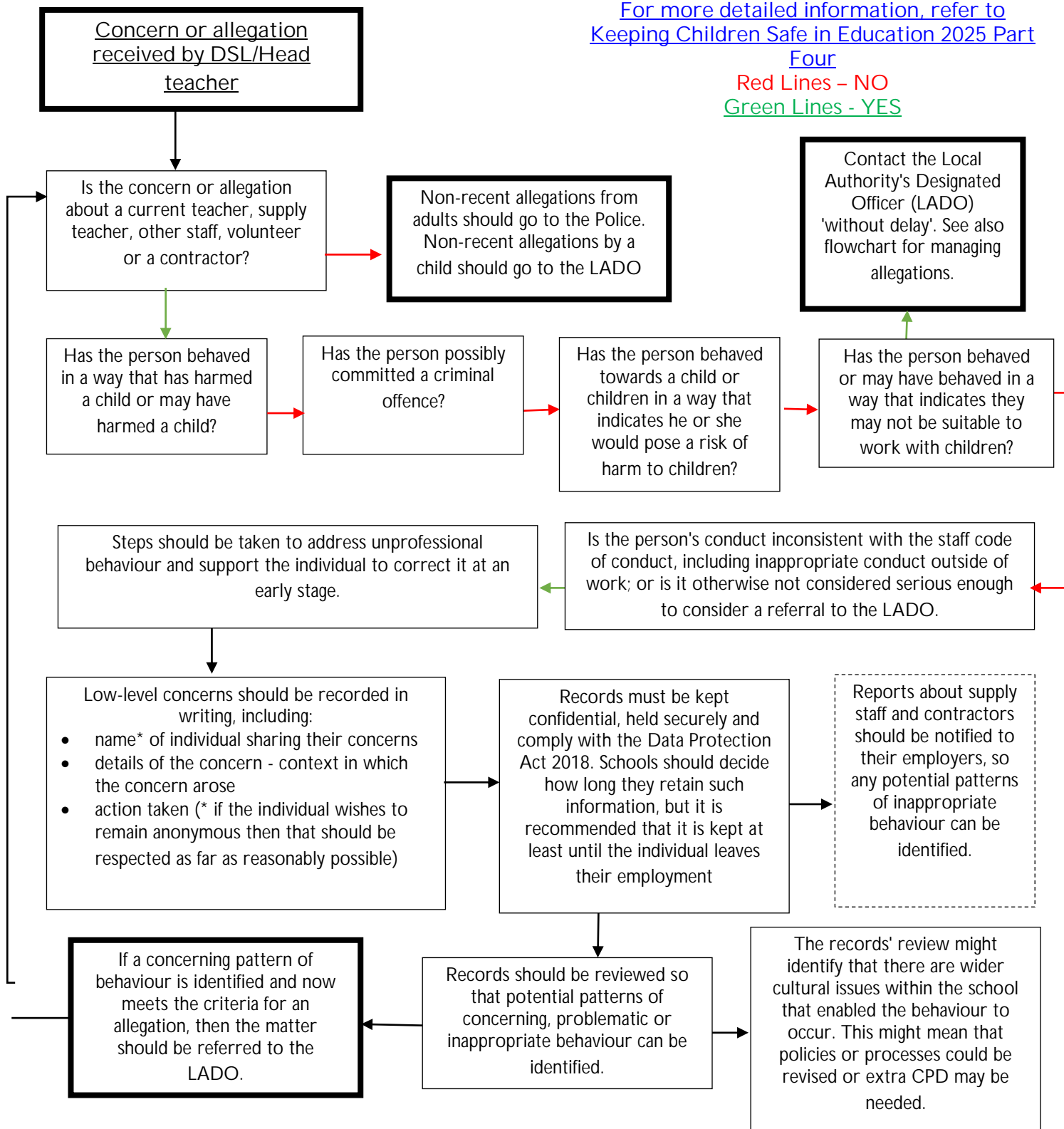
National Crime Agency's [CEOP Education Programme](#) – Provides information for parents and carers to help protect their child from online child sexual abuse, including [#AskTheAwkward - help to talk with your children about online relationships \(thinkuknow.co.uk\)](#) – Guidance on how to talk to their children about online relationships.

# Appendix J – Managing Low Level Concerns

## MANAGING LOW-LEVEL CONCERNS RAISED IN RELATION TO TEACHERS, INCLUDING SUPPLY TEACHERS, OTHER STAFF, VOLUNTEERS AND CONTRACTORS

[For more detailed information, refer to Keeping Children Safe in Education 2025 Part Four](#)

Red Lines – NO  
Green Lines – YES



### What is a 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 set out at KCSIE (2025). A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

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

# Appendix K – Response to reports of sexual violence and sexual harassment

Response to reports of sexual violence and sexual harassment  
See also KCSIE Part 5

REPORT RECEIVED  
(from the victim or third-party)  
[Onsite, offsite or online]

Definitions  
Sexual Violence  
Rape  
Assault by penetration  
Sexual assault  
Sexual Harassment  
Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

Victim reassured

- taken seriously and kept safe; and never be given an impression they are creating a problem
- confidentiality not promised - listen to victim, non-judgementally - record the disclosure (facts as reported)
- two staff present (one being the DSL, or reported to DSL as soon as possible)
- victim sensitively informed about referral to other agencies
- if victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see Keeping Children Safe in Education')
- parents of victim informed unless this would put victim at greater risk.

Anonymity  
Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in the school

Record keeping  
Remember, to record in writing all concerns, discussions, decisions and reasons for decisions.

Considerations  
(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours) Immediately: Consider how to support the victim and the alleged perpetrator

- wishes of the victim
- nature of the alleged incident
- ages of the children
- development stage of the child
- any power imbalance
- one-off, or part of a pattern of behaviour
- any ongoing risks to victim or others
- other related issues and wider context (e.g. CSE)

Manage Internally  
One-off incidents which the school believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's behaviour policy or anti-bullying policy.

Early help  
Non-violent Harmful Sexual Behaviours (see Harmful Sexual Behaviours Framework (NSPCC))

Refer to Social Care  
All incidents where a child has been harmed, is at risk of harm or is in immediate danger. Social Care staff will decide next steps. Be ready to escalate if necessary.

Refer to Police  
All incidents of rape, assault by penetration or sexual assault. (incl. if alleged perpetrator is 10 or under) Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents.

RISK ASSESSMENT  
Case-by-case basis  
(For details see 'Keeping Children Safe in Education' (DfE, 2025))

RISK ASSESSMENT  
Immediately  
Do not wait for outcome of referral before protecting victim.  
Emphasis on victim being able to continue normal routines.  
Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from school) [Not a judgement of guilt]

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

DISCIPLINARY MEASURES TAKEN  
(See school's Relationships & Behaviour Regulation Policy)

DISCIPLINARY MEASURES TAKEN  
(May be undertaken based on balance of probabilities, unless prejudicial or unreasonable)  
Ensure actions do not jeopardise the investigation  
School to work closely with police and/or other agencies.

CRIMINAL PROCESS ENDS

- Conviction or Caution: follow behaviour policy, consider Permanent Exclusion. If pupil remains in school, make clear expectations; keep victim and (alleged) perpetrator apart. Consider victim's wishes.
- Not Guilty: Support victim and alleged perpetrator
- No Further Action: Support victim and alleged perpetrator