Safeguarding and Child Protection Policy

Woodsetton School

Document Information	
Policy owner	Mrs S Allen (Head Teacher)
Lead responsibility	Mrs S Allen (Head Teacher and Designated Safeguarding Lead (DSL))
Approved by	Governing Body
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Version	1.0 following new Legislation from KCSIE and WTTSC
Statutory framework:	Keeping Children Safe in Education (KCSIE) 2026
Multi-agency framework:	Working Together to Safeguard Children (WTTSC) 2026 Also having regard to: Early Years Foundation Stage (EYFS) Statutory Framework (from 1 September 2026)

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Chief Executive Officer, Ascent Academy Trust	David Stanton	01384 818265 can be used to gain additional contact details
Designated Safeguarding lead (DSL) Head Teacher	Sarah Allen	01384 818265 sallen@woodsetton.ascenttrust.org.uk
Deputy DSL	Rebecca Gibbons	01384 818265 rgibbons@woodsetton.ascenttrust.org.uk
DSL/Safeguarding Team	Matthew Halliday Nicola Morris Elizabeth Lampitt	01384 818265 safeguarding@woodsetton.ascenttrust.org.uk
Local Authority Designated Officer (LADO)	Yvonne Nelson-Brown Sukhchandan Kaur	Yvonne.Nelson-Brown@dudley.gov.uk Allegations@dudley.gov.uk Sukhchandan.Kaur@dudley.gov.uk
Local Advisor Board Chair	Kate Hermon	khermon@woodsetton.ascenttrust.org.uk
Safeguarding Governor	Kate Hermon	khermon@woodsetton.ascenttrust.org.uk
Chair of the Trustees	Paul Hill	phill@ascenttrust.org.uk

To be approved by:	K. Hermon	**Date:** September 2026
Last reviewed on:	August 2025	
Next review due by:	August 2027	

1. Policy statement and commitment

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Woodsetton School is committed to safeguarding and promoting the welfare of every child and young person in our care. We recognise that children with special educational needs and/or disabilities (SEND), including those with complex needs, communication differences, and higher dependency on adults, may be especially vulnerable to abuse, neglect, exploitation, and harm.

We will:

- Provide a safe, calm, and inclusive environment in which all children can learn and thrive
- Identify concerns early and secure the right help at the right time, including Family Help and statutory intervention where needed – **NOTICE, HEAR, UNDERSTAND AND ACT**
- Work in genuine partnership with parents/carers in almost all cases
- Work effectively with local partners under WTTSC 2026
- Ensure safer recruitment and a culture in which poor or unsafe practice is challenged
- Teach children, in ways appropriate to their age and needs, how to keep themselves and others safe.

Safeguarding and promoting the welfare of children is everyone's responsibility. This policy applies to all staff, governors/proprietors, volunteers, contractors, supply staff, students on placement, and visitors.

Staff must be aware of Diagnostic Overshadowing when applied to communication needs in children. This refers to the tendency for professionals to attribute a child's communication differences, behaviours, or difficulties solely to an existing diagnosis (e.g., autism, learning disability, ADHD) rather than exploring whether additional communication needs, medical issues, or co-occurring conditions may be present.

2. Scope and definitions

2.1 Who this policy covers

- All pupils from EYFS (including school-based nursery/reception provision where applicable) to age 16
- Children educated on site, off site, dual-registered, or placed in alternative provision
- Children who are young carers, looked after / previously looked after, in kinship care, or otherwise in need of additional safeguarding consideration

2.2 Definition of safeguarding

In line with WTTSC 2026 and KCSIE 2026, safeguarding and promoting the welfare of children means:

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

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

2.3 Types of abuse and harm

Staff must be alert to:

- Physical, emotional, and sexual abuse
- Neglect (including educational neglect and medical neglect)
- Child-on-child abuse (including harmful sexual behaviour)
- Exploitation (criminal, sexual, county lines)
- Domestic abuse (including where the child is a victim in their own right)
- Serious violence and harmful social influences (including misogyny and violence against women and girls)
- Online harms, including misinformation, disinformation, conspiracy theories, and AI-related risks
- Radicalisation and extremism (Prevent)
- Honour-based abuse, FGM, forced marriage
- Children missing or absent from education

For pupils with SEND, staff must not assume that indicators of possible abuse (e.g. behaviour change, marks, withdrawal, distress) are "just part of the disability.

3. Legal and statutory framework

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This policy is underpinned by, and must be read alongside:

- Keeping Children Safe in Education 2026 (in force 1 September 2026)
- Working Together to Safeguard Children 2026
- EYFS Statutory Framework (as applicable to 0–5 provision, including reception)
- Children Act 1989 and 2004
- Education Act 2002, s.175 / s.157
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Crime and Policing Act 2026 (including changes to regulated activity and DBS expectations for volunteers)
- Relevant DfE guidance on attendance, alternative provision, gender questioning children, RSHE, Prevent, and online safety / generative AI
- Local Safeguarding Children Partnership (LSCP) arrangements and thresholds

Where school-based EYFS provision exists, the school will meet both KCSIE and EYFS safeguarding requirements.

4. Roles and responsibilities

4.1 Governing body / proprietor

The governing body will:

- Ensure a whole-school safeguarding culture and effective policies, procedures, and training
- Appoint a senior board-level lead for safeguarding
- Ensure an appropriate senior DSL (and deputies) are in post, trained, and resourced
- Ensure safer recruitment, single central record (SCR) compliance, and arrangements for volunteers in accordance with KCSIE 2026 and current DBS guidance
- Ensure safeguarding is part of curriculum, behaviour, attendance, online safety, and estate/premises arrangements
- Review safeguarding practice, data, and serious incidents; hold leaders to account
- Ensure filtering and monitoring standards are met and regularly reviewed
- Ensure the school contributes to Kate Hermon as their Safeguarding LAB Member to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

Mr. David Stanton as the Chair of the Trustee Board will act as the ‘case manager’ if an allegation of abuse is made against the headteacher, where appropriate.

The Local Advisory Board/Trustees will be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school’s local multi-agency safeguarding arrangements.

All Local Advisory Board Members and Trustees will:

- Have read and understood Keeping Children Safe in Education 2026.
- Ensure the school maintains records demonstrating that all staff, including those who do not work directly with children, have read and understood Part One of KCSIE 2026.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

4.2 Headteacher

The headteacher will:

- Ensure this policy is implemented day to day
- Ensure sufficient DSL cover, including out-of-hours and holiday arrangements where needed
- Lead on allegations against staff (or designate appropriately) in line with Part 4 KCSIE
- Promote a culture of listening to children, professional curiosity, and low-level concern reporting
- Ensure safer recruitment decisions and contractor/supply compliance.

4.3 Designated Safeguarding Lead (DSL) and deputies

The DSL is a senior member of staff from the leadership team with lead responsibility for safeguarding and child protection. Additional staff members are also part of Woodsetton School Safeguarding Team.

Title	Name	Contact
Lead DSL / Head Teacher	S. Allen	sallen@woodsetton.ascenttrust.org.uk
Deputy DSL	R. Gibbons	rgibbons@woodsetton.ascenttrust.org.uk
Additional Safeguarding Team Members (Deputy DSLs are trained to the same standard. Ultimate lead responsibility remains with the DSL). See Appendix 5	M. Halliday N. Morris E. Lampitt	mhalliday@woodsetton.ascenttrust.org.uk nmorris@woodsetton.ascenttrust.org.uk elampitt@woodsetton.ascenttrust.org.uk

Out-of-hours contact: During out of school hours and through school holidays, the DSL can be contacted through the use of the **school Safeguarding Mobile Phone: 07938012292 or via the email: safeguarding@woodsetton.ascenttrust.org.uk**

The DSL will:

- Take lead responsibility for safeguarding, child protection, online safety (including filtering and monitoring oversight with IT leads), and Looked After Children liaison
- Manage referrals to Family Help, children's social care, the police, DBS, Teaching Regulation Agency (TRA), Channel/Prevent, and other agencies
- Support staff, provide advice, and ensure effective recording, risk assessment, and information sharing
- Ensure child protection files are kept confidentially and transferred securely when pupils move settings, including consideration of advance sharing where risk to others may exist
- Lead or coordinate Early Help / Family Help assessment and plans
- Ensure staff training is current and induction is robust
- Work closely with the SENCO / named SEND lead, mental health lead, attendance lead, and Virtual School Head where relevant
- Understand and apply local thresholds and WTTSC multi-agency expectations
- Set out procedures so that staff promptly share their safeguarding concerns in writing – this will be done using The Brier School Reporting system – https://apps.cpoms.net/woodsetton
- Keep the headteacher informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate, especially ongoing enquiries under section 47 of the Children's Act 1989.

4.4 All staff

All staff will:

- Read and understand Part 1 of KCSIE 2026 (and Annex B where relevant to their role); the school will ensure systems confirm this
- Follow this policy and the staff code of conduct
- Be professionally curious; report concerns immediately — including low-level concerns about adults
- Never assume someone else will act
- Maintain appropriate professional boundaries, especially given the intimate/personal care needs common in special schools
- Support a listening culture and report what children communicate through words, behaviour, AAC, or play

4.5 SENCO / named SEND lead / Pastoral Lead

The SENCO works with the DSL to ensure safeguarding risks linked to need, communication barriers, intimate care, physical intervention, transport, and medical needs are understood and mitigated, and that EHCP information informs safety planning without delaying protection.

5. Training, induction, and safeguarding culture

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The school recognises that effective safeguarding depends upon a strong culture of vigilance, professional curiosity, reflective practice, and continuous learning.

5.1 Staff induction

All new staff, including temporary staff, agency workers, volunteers, governors, students, and contractors working regularly with pupils, will receive safeguarding induction before or as soon as reasonably practicable after commencing duties.

Induction will include:

- This Safeguarding and Child Protection Policy
- The Staff Code of Conduct
- Behaviour Policy
- Online Safety and Acceptable Use Policies
- Whistleblowing arrangements
- The identity and role of the DSL and Deputy DSLs
- Child-on-child abuse procedures
- Staff responsibilities under Part 1 of KCSIE 2026
- Procedures for reporting concerns and managing disclosures
- Safeguarding arrangements specific to SEND and special school provision

5.2 Ongoing training

The school will ensure:

- Safeguarding training is updated regularly in accordance with KCSIE 2026 and local requirements
- DSL and Deputy DSL training is refreshed at least every two years and supplemented by continuous professional development
- Staff receive regular safeguarding updates throughout the year
- Governors receive appropriate safeguarding training and updates
- Training reflects emerging risks and local safeguarding priorities

Training may include:

- Child protection
- Child-on-child abuse and harmful sexual behaviour
- Online safety and AI-related risks
- Exploitation and county lines
- Domestic abuse
- Prevent and radicalisation
- Attendance and children missing education
- Trauma-informed practice
- SEND-specific safeguarding vulnerabilities
- Professional curiosity and effective information sharing

5.3 Safeguarding culture

The school will promote a culture where:

- Children feel safe, listened to, and respected
- Concerns are welcomed and acted upon
- Staff understand safeguarding is everyone's responsibility
- Poor practice is challenged
- Low-level concerns are reported
- Learning from incidents informs future practice

Diversity, equality, and inclusion are promoted, and the school will actively challenge racism, discrimination and bias and will consider whether these factors impact safeguarding identification, assessment or outcomes.

All staff members will undertake safeguarding and child protection training, online safety training including IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse, neglect and exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

In addition, all staff will:

- undertake annual training on Cyber-security training.

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- have regard to the Teachers' Standards to support the expectation that all teachers:
    - manage behaviour effectively to ensure a good and safe environment
    - have a clear understanding of the needs of all pupils/students.
- receive training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- receive regular safeguarding and child protection updates including online safety, as required but at least annually. Regular updates throughout the academic year could include (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- receive robust safeguarding training in line with the whole school training package, this will be delivered as part of their induction process.

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

5.4 Local Advisory Board Members and Trustees Training

All Local Advisory Board Members / Trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This will ensure that all Local Advisory Board Members / Trustees have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge, in addition that they can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

5.5 Volunteers and Contractors

Volunteers, contractors and other visitors will receive safeguarding information on arrival, including how to report concerns, expected standards of behaviour and guidance on the safe use of technology.

All visitors must provide identification, sign in, wear a visitor badge and follow the school's visitor procedures, which may include securely storing personal belongings and mobile phones. Visitors who are not known to the school will have their identity and purpose for visiting verified before access is granted. Visiting professionals must provide appropriate identification and evidence that the necessary DBS checks have been completed. Visitors, including guest speakers, will be supervised as required, and the school will not allow individuals or organisations that promote extremist views. All visitors must sign out when leaving and report any safeguarding concerns they have observed, which will be recorded in line with school procedures.

6. Early identification, Family Help, and statutory intervention

In line with KCSIE 2026 and WTTSC 2026, the school prioritises early identification of need and harm.
Staff should be particularly alert to:

- Children with attendance issues including persistent absence, punctuality, missing from school
- Children who display behaviour changes including those at risk of Permanent Exclusion, those attending Alternative Education or a Pupil Referral Unit, or those attending school on a part-time basis
- Children with Medical conditions / Health needs
- Children with Special Educational Needs or Disabilities
- Children with communication needs - **Diagnostic Overshadowing. *"All staff need to be able to interpret non-verbal and pre-verbal cues, observe interactions and remain professionally curious" – WTTSC 2026*
- Children in poverty or experiencing homelessness
- Children who are Young Carers, Young Parents/who are Pregnant
- Children experiencing discrimination due to their race, ethnicity or religion.
- Child at risk of Exploitation (inc. criminal and sexual). See Appendix 2 for further information.
- Children experiencing Domestic Abuse
- Children experiencing Adult Mental Health difficulties within the home

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- Children experiencing Alcohol / Drug misuse (personal or within the home)
- Children with Mental Health difficulties – including, self-harm, eating disorders, suicidal thoughts, making plans to end life.
- Children who are Lesbian, Gay, Bisexual, Transgender or who are questioning their gender identification or sexuality
- Children at risk of FGM, forced marriage, or radicalization
- Children who are care-experienced children - Looked After and Post-Looked After Children / Children who are privately fostered.
- Children with family members in prison / Parents offending

Local multi-agency safeguarding arrangements.

The school's policy has been written taken into consideration our locally agreed multi-agency procedures that have been put in place by the three safeguarding partners:

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

The links for Dudley's procedures are below:

Dudley Safeguarding People Partnership Website

Three safeguarding priorities have been identified for 2026-2027:

- Mental Health of Children, Young People and Adults with care and support needs, including the impact of parental mental health
- Transitional Safeguarding
- Exploitation

These are detailed further on the above website and are included in whole-school training.

The Local Authority Response continuum can be found using the following link:

Dudley's Continuum of Help and Support

In line with KCSIE 2026 and Working Together to Safeguard Children 2026, safeguarding support should be provided through a continuum of need, ensuring that children receive the right help at the right time.

- Most needs will be met through **Universal support within school** (Pathway 1), while some children and families may benefit from **Early/Family Help** (Pathway 2), involving coordinated multi-agency support with consent where appropriate.
- Where a child is assessed as a **Child in Need** (s.17 Children Act 1989), statutory services may provide additional support to safeguard and promote their welfare (Pathway 3).
- If there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a **Child Protection** (s.47 Children Act 1989) response will be required (Pathway 4).

Referrals will not be delayed while seeking "perfect" information; where a child is in immediate danger or at risk of significant harm, a referral will be made to children's social care and/or the police without delay. Where concerns exist regarding an unborn child, the school will contribute to pre-birth assessments and multi-agency planning as appropriate.

7. Responding to concerns about a child

7.1 If a child makes a disclosure or a concern arises for the safety and wellbeing of a child

Staff must:

1. Listen calmly; do not promise confidentiality
2. Reassure the child they have done the right thing
3. Record factually (date, time, who present, child's words where possible, observed behaviour/injuries)
4. Not investigate, cross-examine, or take photographs of injuries

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5. Report immediately to the DSL/deputy via https://apps.cpoms.net/woodsetton and via face-to-face conversation. If this ICT system cannot be accessed, this should be done in paper format and signed and dated before being passed on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. **Dudley Report it page https://dudleysafeguarding.org.uk/**
6. Use body maps where appropriate; seek medical help if required

Staff must not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process. It is important to also understand the following:

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

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

It is important to remember that children may experience multiple, overlapping forms of harm simultaneously and assessments should consider cumulative risk.

To refer into Dudley Exploitation hub (DEx): CS.Hub@dudley.gov.uk also complete a Request for Support and Advice Form to be submitted via the portal.
You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

7.2 DSL decision-making

The DSL will consider:

- Immediate safety
- Thresholds for Family Help vs statutory referral
- Consent and information sharing (see section 14)
- Voice of the child and parent/carer involvement (unless unsafe)
- Context (home, community, online, peer group)
- Need for strategy discussion, Early Help assessment, or multi-agency meeting

All decisions, including decisions not to refer, will be recorded with rationale.

7.3 Escalation

If the school remains concerned after a referral or disagrees with a partner decision, the DSL will escalate through local LSCP escalation procedures without delay.

8. Child-on-child abuse and harmful sexual behaviour (HSB)

We take a zero-tolerance approach to child-on-child abuse. It will never be dismissed as "banter," "part of growing up," or "normal for children with SEND."
This includes:

- Bullying (including cyberbullying)
- Physical abuse
- Sexual harassment and sexual violence
- Upskirting
- Consensual and non-consensual sharing of nude/semi-nude images
- Initiation/hazing
- Abuse in intimate relationships between peers
- Harmful sexual behaviour across a continuum

Part 5 KCSIE 2026 expectations will be followed using an evidence-based continuum approach to assess, risk-manage, support victims, and address the behaviour of the child who has harmed — with consideration of SEND, developmental stage, and supervision levels.

Support and sanctions will be considered under the behaviour policy, risk assessments, and multi-agency pathways. Parents/carers will be engaged appropriately. Police referral will be made where required.

Child-on-Child Abuse Response Principles

The school will:

- Take all reports seriously.
- Ensure victims are supported and protected.
- Complete robust risk assessments.
- Consider the wishes of the victim.
- Work with parents/carers where appropriate.
- Refer to external agencies where required.
- Address behaviour proportionately and educationally.
- Monitor ongoing safety and wellbeing.

9. Online safety, technology, AI-related risks, sharing of indecent images and the use of mobile phones / devices.

9.1 Online safety is integral to safeguarding and covers content, contact, conduct, and commerce risks, including misinformation, disinformation, conspiracy theories, and generative AI risks (e.g. deepfakes, AI-generated sexual imagery, grooming facilitated by AI tools, over-reliance on AI companions).

The school will:

- Maintain robust filtering and monitoring aligned to DfE standards, with clear roles for DSL, IT, and governors
- Ensure acceptable use policies for staff, pupils, and visitors including the use of mobile devices
- Risk-assess technology used for curriculum, AAC, and remote learning
- Train staff to recognise online harms relevant to SEND pupils (who may be more suggestible, isolated, or supervised less consistently online at home)
- Respond to incidents (including image-based abuse) in line with UKCIS / DfE guidance and report externally when required

9.2 Consensual and Non-consensual sharing of indecent images

This is a suggested approach based on guidance from the UK Council for Internet Safety advice for education settings for all staff and for DSLs and senior leaders.

Responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through:

- Police - 999 or 101 - 8513087
- Child Abuse Investigation Unit 101 or 0345 113 5000

9.3 Mobile Phones and Smart Devices

In line with the Department for Education's statutory Mobile Phones in Schools guidance, the school is a mobile phone-free environment. Pupils are not permitted to use mobile phones or other smart devices with similar functionality during the school day, including lessons, transitions between lessons, breaktimes, and lunchtimes, unless an agreed exception is in place for safeguarding, medical, or educational reasons. The school will ensure that any use, storage, monitoring, and confiscation of devices is managed in accordance with the Behaviour Policy, safeguarding procedures, and relevant data protection requirements. This approach supports pupils' learning, wellbeing, online safety, and the creation of a calm and safe school environment.

10. Mental Health

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 school will:

- Promote whole-school wellbeing appropriate to a special school context
- Ensure clear routes from pastoral/mental health leads to the DSL where safeguarding concerns exist
- Work with CAMHS and other services
- Avoid conflating distress arising from unmet need, sensory overload, or communication frustration solely as "behaviour"

The Schools Senior Mental Health Lead is Mrs. S Allen (DSL)

11. Children absent from education and attendance

Attendance is a safeguarding issue. Patterns of absence, part-time timetables, and unexplained missing episodes will be treated with professional curiosity, particularly for pupils with SEND and those transported by LA/contractors.
The school will follow statutory attendance expectations, maintain accurate registers, conduct first-day calling / welfare checks proportionate to risk, and work with the LA where children are missing education or at risk of off-rolling. Safeguarding concerns linked to absence will be referred as appropriate.

12. Children who are questioning their gender

In line with KCSIE 2026 and statutory guidance on gender questioning children, the school will:

- Approach concerns with care, watchful waiting where appropriate, and the best interests of the child
- Involve parents/carers in most cases, unless there is a compelling safeguarding reason not to

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- Avoid premature social transition decisions as a default; decisions will be case-by-case, multi-informed, and recorded
- Work with clinicians/other professionals where involved
- Protect the child from bullying and ensure privacy, dignity, and equal access to education
- Apply the same safeguarding duties as for any child — gender questioning does not override child protection responsibilities

13. Safer recruitment and regulated activity (including volunteers)

Safer recruitment is a core part of prevention. The school's safer recruitment practices are undertaken in accordance with KCSIE 2026 and current DBS guidance.

Regulated activity means a person who will be:

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

The school will:

- Maintain a complete, accurate Single Central Record
- Complete shortlisting, online searches (where used) in line with KCSIE, interviews, and reference checks with safeguarding questions
- Obtain appropriate DBS checks and barred list checks for those in regulated activity
- Verify identity, right to work, qualifications, and further checks for those who have lived or worked abroad
- Ensure at least one recruiter on each panel is safer recruitment trained

The school will carry out appropriate DBS and barred list checks for volunteers in accordance with KCSIE 2026, current DBS guidance and the nature of the activity being undertaken.

From 1 September 2026, the previous “supervision exemption” no longer applies as before. Where volunteers are in regulated activity, the school will obtain the required enhanced DBS with children’s barred list check (or standalone barred list check where applicable for existing volunteers newly in regulated activity).
Existing volunteers who become engaged in regulated activity because of the legal change will have barred list status checked as required by KCSIE 2026.
Supply staff, contractors, trainee teachers, and agency workers will not start work without written confirmation of checks from the relevant provider and identity verification on arrival.

14. Allegations and low-level concerns about staff, supply, volunteers, and contractors

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, **speak directly to the Headteacher** (NOT to DSL, unless DSL is also the Headteacher). If the concerns/allegations are about the headteacher, speak to the Chief Executive Officer, Mr. David Stanton.

Schools must work with other agencies to investigate when a member of staff has **“behaved or may have behaved in a way that indicates they may not be suitable to work with children”**

14.1 Allegations that may meet the harm threshold

If it is alleged that anyone working with children has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child/ren in a way that indicates they may pose a risk of harm

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including transferable risk)

…the matter will be reported immediately to the headteacher (or Chief Executive Officer if about the headteacher). The headteacher will contact the LADO and follow the guidance in KCSIE. Suspension is not automatic.

Local Authority Designated Officer: Yvonne Nelson-Brown – 01384 813061

Yvonne.nelson-brown@dudley.gov.uk

Referrals to DBS (and TRA where appropriate) will be made when legal/duty thresholds are met, including on resignation.

14.2 Low-level concerns

Low-level concerns (behaviour inconsistent with the staff code of conduct, including inappropriate conduct outside work, that does not meet the allegation threshold) must be reported to the headteacher/DSL as designated. Patterns will be reviewed. Self-reporting is encouraged. Records will be kept securely and in line with KCSIE.

This is especially important in a special school context (personal care, moving and handling, lone working, residential/after-school elements if applicable).

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

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

At Woodsetton School we expect all staff to adhere to school policy and practice and therefore, report any concerns they may have about other staff members should they feel there is a low-level concern. This should be done in the same way as any other referral / concern about a staff member and should be directed to the Head Teacher.

To ensure clarity and avoid delay, concerns about adults working in the school must be reported through the following routes:

- Concerns, allegations, or low-level concerns about a member of staff, volunteer, contractor or supply staff member must be reported directly to the **Headteacher**.
- Concerns, allegations, or low-level concerns about the **Designated Safeguarding Lead (DSL)** must be reported directly to the **Headteacher**.
- Concerns, allegations, or low-level concerns about the **Headteacher** must be reported directly to the **Chief Executive Officer (CEO)** and/or the **Chair of the Local Advisory Board/Trustees**, who will act in accordance with KCSIE procedures and seek advice from the Local Authority Designated Officer (LADO) where appropriate.

Staff should not investigate concerns themselves and should report concerns as soon as possible. Any uncertainty about whether a concern meets the harm threshold should not delay reporting. Concerns will be assessed promptly, recorded appropriately, and managed in accordance with Part Four of Keeping Children Safe in Education and local safeguarding procedures.

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Where necessary, further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken.

Recording concerns - A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the Head Teacher, a record of the conversation will be made by the Head Teacher which will be signed, timed, and dated. This information will be held securely by the Head Teacher.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

15. Information sharing, recording, and confidentiality

› Effective information sharing is essential. Fears about data protection must not prevent the sharing of information necessary to protect children. The government's **information sharing advice for safeguarding practitioners** includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

The school will:

- Record concerns without delay on CPOMs
- Keep child protection records separate, secure, and retained in line with guidance
- Share with other schools/colleges when pupils transfer; the DSL will consider advance sharing where needed to manage risk
- Apply UK GDPR principles with safeguarding exemptions understood
- Ensure staff know that the DSL decides on wider sharing beyond immediate reporting pathways

Staff must not discuss cases in open spaces, social media, or with unauthorised persons.

16. Multi-agency working (WTTSC 2026)

The school will work with children's social care, health, police, Family Help, Virtual School, youth justice, and other partners under local LSCP arrangements.

We will:

- Contribute actively to assessments, strategy meetings, core groups, conferences, and plans
- Align practice with Early Years and multi-agency expectations where relevant
- Challenge and escalate when multi-agency responses appear insufficient
- Ensure the child's lived experience and voice (including non-verbal communication) inform plans.

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The school recognises that safeguarding assessments and plans should be anti-discriminatory and culturally informed. Professionals will consider whether factors such as disability, race, ethnicity, culture, faith, language, sex, sexual orientation, poverty or previous experiences of discrimination may affect how concerns are identified, understood, communicated or responded to.

17. Specific safeguarding arrangements for an primary special school (EYFS–11)

Woodsetton School is a special school for pupils with complex needs aged 4-11 years, all of whom are vulnerable. Staff arrangements are in place to meet the needs of all children in school which promotes their safety. In addition, there are numerous ways in which the safety and dignity of pupils are prioritised, including:

- The safe storage, administration and recording of prescribed medication by qualified first aiders in school (further details in our Medicines Policy).
- Rigorous training, which is updated annually for staff in hoisting, minibus wheelchair clamping, Diabetes, PEG feeding, epilepsy, asthma and anaphylaxis.
- Personal plans for individual pupils for Intimate Care, medical conditions, site evacuation, risk assessment of the school site, trips, evacuation, all in addition to group/class plans.

17.1 EYFS

Our Early Years Foundation Stage (EYFS) pupils are part of Moles & Caterpillar class. Staff in EYFS are trained alongside staff in the main body of school in Safeguarding and Child Protection, Makaton signing, and TEAM TEACH, enabling them to communicate effectively with pupils and quickly spot signs of concern such as changes in behaviour and communication.

For under-5s / Reception:

- EYFS safeguarding and welfare requirements apply alongside KCSIE
- Suitable people, ratios, paediatric first aid, mobile phone/camera controls in EYFS areas, and premises safety will be enforced
- Sleeping children, outdoor play, and visitors to EYFS will be risk-managed

EYFS Personal Care, Toileting, Changing and Use of Cameras

Due to the age, development, medical needs and additional vulnerabilities of some pupils, the school recognises that personal care and intimate support are significant safeguarding considerations. All changing, toileting and personal care arrangements will be undertaken in accordance with the school's Intimate Care Policy, individual care plans and risk assessments where appropriate. Staff will ensure that pupils are treated with dignity, respect and privacy at all times, while maintaining appropriate levels of supervision and safeguarding. Records will be maintained where required, and any concerns arising from personal care routines will be reported immediately through safeguarding procedures.

In EYFS and across the wider special school provision, arrangements for nappy changing, toileting support, continence care and other personal care needs will be clearly planned, risk assessed and communicated with parents/carers. Wherever possible, pupils' preferences, communication needs and individual circumstances will be taken into account.

The use of cameras, mobile phones, tablets and other image-capturing devices within EYFS areas will be strictly controlled. Personal devices must not be used to take photographs or videos of pupils. Only authorised school equipment may be used for educational, assessment or safeguarding purposes, in accordance with the school's Online Safety, Data Protection and Acceptable Use policies. Images will be stored securely and used only for legitimate educational or safeguarding purposes.

17.2 Communication and voice of the child

Staff will use appropriate means (speech, Makaton, visual cues/ALDs, AAC devices, observation of behaviour/sensory presentation) to understand worries and wishes. Advocacy will be arranged where needed.

17.3 Intimate and personal care

Intimate care will follow a written protocol, individual care plans, preferred carer arrangements where possible, dignity and privacy standards, and recording. Two-person care will be used where risk-assessed

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as required. Intimate care records will be monitored by senior leaders, and safeguarding audits will identify patterns, themes or repeated concerns.

17.4 Physical intervention and restriction

Any restrictive physical intervention will comply with law and guidance, be a last resort, be recorded and reviewed, and analysed for safeguarding patterns (including possible abuse indicators or unmet need). Additional information can be found in the DFE Use of reasonable force and other restrictive interventions guidance

17.5 Medical needs and medication

Health care plans link to safeguarding where neglect, fabricated or induced illness, or poor adherence creates risk. Only trained staff administer medication under policy.

17.6 Transport and off-site education

Safeguarding responsibilities continue during transport and off-site activities. Providers must confirm safer recruitment and safeguarding arrangements. Alternative provision placements remain the school's safeguarding responsibility in line with KCSIE. Escorts, transport staff and contracted providers will know how to report safeguarding concerns directly to the school DSL.

17.7 Transitions (including phase transfers)

Safeguarding information will transfer securely, promptly, and in accordance with KCSIE 2026 expectations whenever a pupil moves between classes, phases, schools, alternative provision and specialist placements.

The DSL will ensure that:

1. Relevant safeguarding records are reviewed prior to transfer.
2. Child protection files are transferred securely and confirmation of receipt is obtained.
3. Key safeguarding risks, protective factors, communication needs, and support arrangements are shared on a need-to-know basis.
4. Transition planning takes account of vulnerability to exploitation, online harm, mental health concerns, attendance issues, and changes in care arrangements.
5. Looked After Children, children with Child Protection Plans, Child in Need Plans, EHCPs, or significant medical needs receive enhanced transition support.
6. Pupils and families are supported to understand changes and know who to contact if they are worried.

18. Whistleblowing

The school expects all staff to raise concerns where they believe that:

- A child may be at risk of harm
- A member of staff has acted inappropriately
- Safeguarding procedures are not being followed
- Leadership actions place children at risk
- Criminal, unethical, or unsafe practice may be occurring

Concerns should be raised through:

1. The headteacher;
2. The chair of governors where concerns involve the headteacher;
3. The Local Authority Designated Officer (LADO) where appropriate;
4. Relevant external bodies where internal processes are inappropriate or ineffective.

No member of staff will suffer detriment for raising a genuine safeguarding concern in good faith.

Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, staff may seek free confidential help from the independent charity, **Public Concern at Work,** Tel: 0207 404 6609 or through whistle@pcaw.co.uk

Staff members can also raise concerns with the NSPCC Whistleblowing Advice Line on 0800 0280285 from 8.00am to 20.00pm Monday to Friday and from 9.00am to 18.00pm at weekends.

19. Complaints

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Parents, carers, pupils, and other stakeholders who have concerns regarding safeguarding practice should raise these through the school's complaints procedure.
Nothing in the complaints process should prevent:

- Immediate safeguarding action being taken;
- Referrals to children's social care or police;
- Referrals to the LADO;
- Escalation through local safeguarding partnership procedures.

Where a complaint raises child protection concerns, safeguarding procedures will take precedence over complaints procedures.

20. Monitoring, evaluation, and quality assurance

The governing body and senior leaders will monitor safeguarding effectiveness through:

- DSL reports to governors
- Safeguarding audits and self-evaluation
- Reviews of safeguarding records and trends
- Analysis of attendance, behaviour, exclusions, and incidents
- Monitoring of filtering and monitoring systems
- Staff, pupil, and parent feedback
- Learning from safeguarding practice reviews, local reviews, and national reviews

Areas for development will be incorporated into school improvement planning.

21. Equality, diversity, and inclusion

Safeguarding arrangements will be implemented fairly, consistently, and without discrimination.
The school recognises that some children may face additional barriers to disclosure or support due to:

- Disability or SEND
- Communication differences
- Race, ethnicity, culture, religion, or belief
- Sex
- Sexual orientation
- Gender identity issues or gender questioning
- Family circumstances
- Care experience
- Poverty or social disadvantage

Reasonable adjustments will be made to ensure all children can access protection, support, and advocacy.

22. Policy review

This policy will be reviewed:

- Annually by the governing body; and
- Immediately following significant legislative, regulatory, local, or national safeguarding changes.

The DSL will monitor changes in:

- KCSIE guidance;
- Working Together to Safeguard Children;
- EYFS statutory requirements;
- Local Safeguarding Children Partnership procedures;
- Relevant legislation and case law.

Interim updates may be issued to staff before formal policy review where necessary.

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Appendix 1: Additional Key Safeguarding Contacts

Service	Contact Details
Children's Social Care / MASH	Dudley Front Door – 0300 555 0050
Emergency Duty Team	0300 555 8574
Police	999 (emergency) / 101 (non-emergency)
Prevent Team	01384 816883
Virtual School Head	01384 815208
School Nursing Service	Email: **shropcom.brighterfuturesschoolhealth@nhs.net** Contact Telephone Number - 01384 408990
CAMHS Crisis Team	01384 324689 0800 086516
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285

Appendix 2: Categories and Indicators of Abuse

Staff should refer to KCSIE 2026 and local procedures for detailed indicators. A link can be found here to the document

Keeping children safe in education 2026: Part one

Physical Abuse
Including hitting, shaking, burning, poisoning, suffocating, fabricating illness, or otherwise causing physical harm.

Emotional Abuse
Persistent emotional maltreatment that adversely affects a child's emotional development, self-worth, or wellbeing.

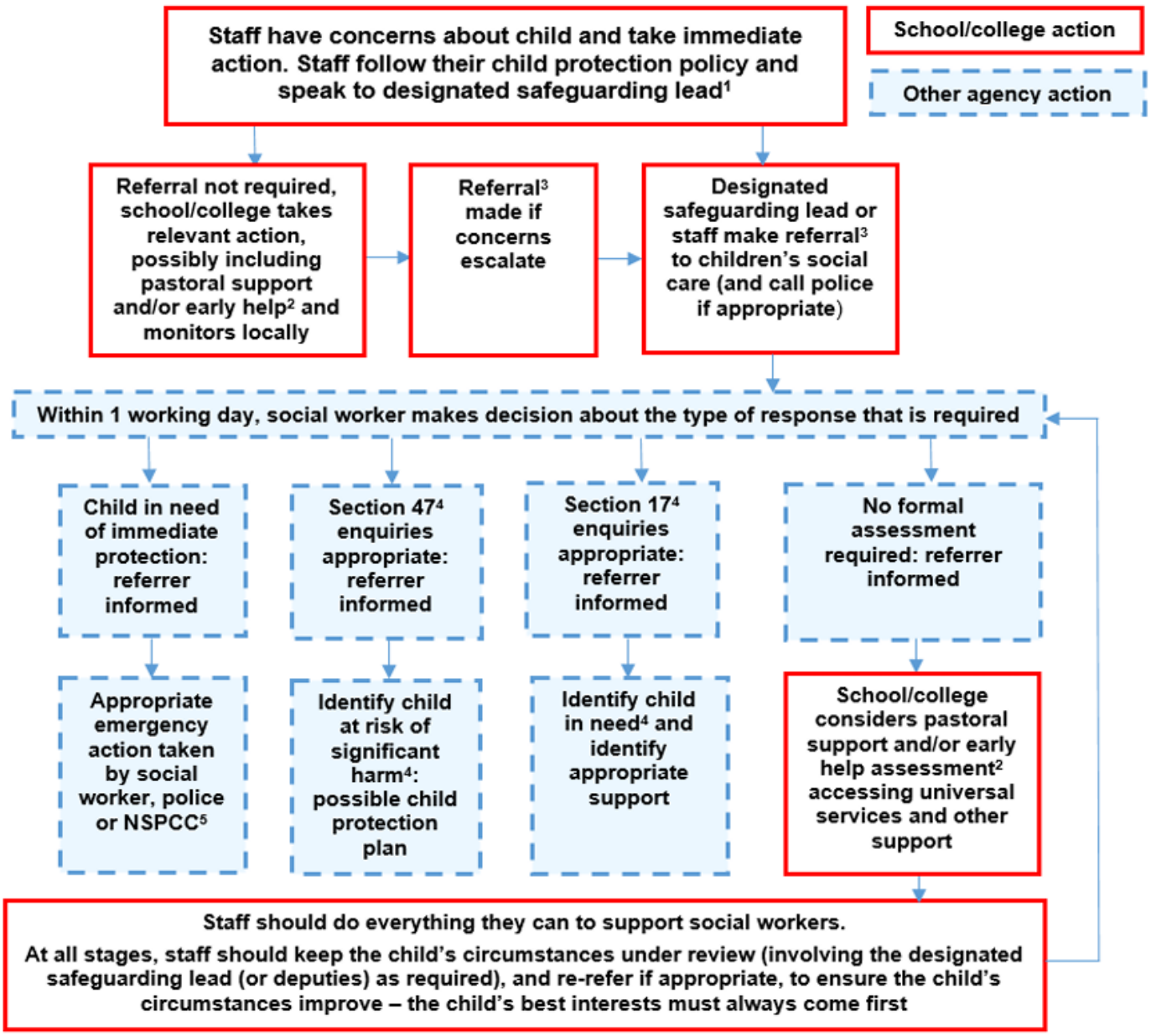
Sexual Abuse
Forcing or enticing a child to take part in sexual activities, whether contact or non-contact, including online abuse.

Neglect
Persistent failure to meet a child's basic physical and/or psychological needs, including educational and medical neglect.
Staff must consider how indicators may present differently in children with SEND.

Serious Violence and Criminal Exploitation
Staff should be aware that involvement in serious violence, criminal exploitation, county lines activity or gang-associated behaviour may increase a child's vulnerability to harm. Indicators may include increased absence from school, a significant decline in attendance or punctuality, unexplained gifts, money, clothing or possessions, association with older children or adults, changes in friendships or peer groups, increased secrecy, carrying weapons, knife-related concerns, injuries, or changes in behaviour, presentation or emotional wellbeing. While these indicators do not necessarily mean that a child is experiencing exploitation or involvement in serious violence, they should be viewed with professional curiosity and discussed with the DSL without delay. Particular consideration should be given to pupils with SEND, whose vulnerabilities and communication needs may make risks more difficult to identify or disclose.

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Appendix 3: Safeguarding Reporting Flowchart



Appendix 4: Linked Policies

This policy should be read alongside:

- Staff Code of Conduct
- Behaviour Policy
- Online Safety Policy including Filtering and Monitoring
- Acceptable Use Agreements
- Attendance Policy
- Anti-Bullying Policy
- Intimate Care Policy
- Positive Handling/Restrictive Intervention Policy
- Health and Safety Policy
- Supporting Pupils with Medical Conditions Policy
- SEND Policy
- Complaints Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Educational Visits Policy
- Equality and Accessibility Policies
- Gender Questioning Children Protocol
- Data Protection and Records Management Policies
- Moving & Handling Policy
- Prevent Duty Policy and Risk Assessment

Appendix 5: The DSL and Deputy DSL Training

The DSL and deputy/deputies will undertake child protection and safeguarding training at least every 2 years to ensure they are able to identify, understand and respond to specific needs that can increase the vulnerability of children including those of SEND Children specifically. Online safety training will be undertaken annually and regularly updated to keep knowledge of staying safe online and the risks associated up to date, this includes including filtering and monitoring and cyber security. The DSL should also undertake Prevent Awareness Training.

Name of Staff Member	Role	Training Expires
Sarah Allen	DSL / Head teacher	November 2026
Rebecca Gibbons	Deputy DSL / Assistant Head teacher / Butterfly class teacher	October 2026
Matthew Halliday	DSL / Deputy Head teacher	October 2027
Nicola Morris	DSL / Family Support Worker	February 2028
Elizabeth Lampitt	DSL / Assistant Head teacher / Frog class teacher	April 2028

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