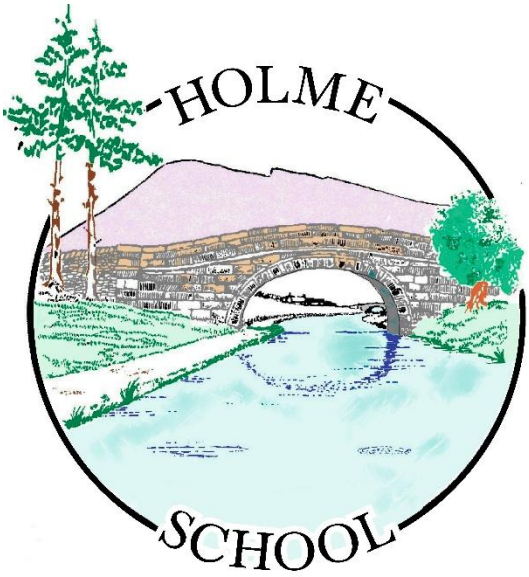
Westmorland & Furness Council



Safeguarding and Child Protection Policy
2026-2027

Key personnel and governors with designated safeguarding and child protection responsibilities	
Headteacher	Craig Dewar-Willox
Chair of Governors	Susan Turner
Safeguarding Link Governor	Susan Turner

Key Safeguarding Personnel

Name	Role
Designated Safeguarding Lead (DSL)	Craig Dewar-Willox
Deputy Designated Safeguarding Lead (DDSL)	Louise Burton and Rebecca Shepherd
Pastoral staff	Louise Burton, Pupil Support Manager
Designated Teacher for Cared For and Previously Cared For Children	Craig Dewar-Willox
Special Education Needs Coordinator (SENCo)	Craig Dewar-Willox

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Introduction

Safeguarding and promoting the welfare of children is the responsibility of all adults, regardless of their role, to ensure the safety and wellbeing of children attending Holme Community School.

All schools must have regard to Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), which set out safeguarding responsibilities, processes, and procedures. Schools must also follow guidance issued by the Westmorland and Furness Safeguarding Children Partnership (W&FSCP).

Keeping Children Safe in Education (2026) defines safeguarding and promoting the welfare of children and young people (under 18) as:

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

Part One: Governance

1.1 The role and responsibility of the Governing Body

Provides strategic leadership for safeguarding arrangements that comply with statutory guidance.

To meet its statutory obligations the governing body has:

- Appointed a safeguarding link governor to lead safeguarding oversight,
- Ensured the safeguarding link governor accesses appropriate safeguarding training to support and advise the governing body
- Ensured the full governing body receives safeguarding training, including online safety responsibilities and obligations under the Data Protection Act (2018) and UK GDPR,
- Ensured the link governor undertakes role-specific training and meets at least termly with the Designated Safeguarding Lead (DSL) to maintain oversight and ensure policies remain compliant,
- Adopted the National Governance Association (NGA) Code of Conduct,
- Undertaken an annual safeguarding audit, reported to the full governing body

1.2 The Designated and Deputy Safeguarding Lead (DSL and DDSL)

The Designated Safeguarding Lead is a member of the senior leadership team. The setting also has deputy safeguarding lead(s), trained to the same level as the DSL, to ensure:

- Effective day-to-day safeguarding arrangements and governance, including online safety,
- Provide support and guidance for staff, volunteers, supply staff and contractors on safeguarding and child protection matters,
- Fulfilment of statutory responsibilities to identify children at risk of significant harm, child protection and work with partner agencies in line with W&FSCP procedures.

Including:

- Identifying concerns early and providing Family Help to prevent escalation,
- Consulting and sharing information appropriately with agencies, including Children's Social Care, in accordance with the Data Protection Act (2018) and UK GDPR (2018), regardless of who raised the concern – other children, members of the public, parents or relatives
- Working with key professionals, including the SENCo, attendance leads and designated teacher for cared-for and previously cared-for children, to safeguard vulnerable children
- Promoting a safe learning environment through education on online safety, relationships education, positive behaviour and bullying,
- Supporting parents and carers to keep children safe online,
- Ensuring adequate DSL/DDSL cover outside core hours and during school holidays,
- Inducting new staff and signposting safeguarding policies and procedures,
- Ensuring visitors, supply staff and contractors receive key safeguarding and health and safety information and know how to report concerns,
- Reviewing the effectiveness of filtering and monitoring systems,
- Ensuring the RHSE programme covers online harm, sharing images, deep fakes, pornography, generative AI and misogynistic influencers and when and where to seek help,
- Managing the transfer of safeguarding records between schools when children/young people move including sharing information with relevant staff and sharing a summary of current safeguarding concerns with the next schools.

The full role of the DSL/DDSL is detailed in Annex B of Keeping Children Safe in Education 2026 – Role of the Designated Safeguarding Lead.

1.3 Legislative framework and guidance

All action taken by Holme Community School will be in accordance with:

1.3.1 Legislation:

Children Act 1989 and 2004; Education Act 2002 and 2011; Childcare Act 2006 (where applicable); Education and Inspections Act 2006; Human Rights Act 1998; Equality Act 2010, including the Public Sector Equality Duty.

1.3.2 Statutory guidance:

Keeping Children Safe in Education (2026) sets out safeguarding requirements for schools and colleges. *Working Together to Safeguard Children (2026)* sets out multi-agency safeguarding arrangements and the role of education settings. Westmorland and Furness Safeguarding Children Partnership procedures outline how agencies work together to safeguard children and young people.

1.3.3 Department for Education (DfE) guidance and advice

- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (May 2024)
- What to Do if You're Worried a Child is Being Abused (2015)
- Use of Reasonable Force (2013)
- Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings (2022)
- Teachers' Standards (2021)
- Other relevant guidance relating to behaviour, bullying, online safety, medical needs and attendance

1.4 Safeguarding policies and procedures

1.4.1 Effective safeguarding policies and procedures:

- Should be clear, accessible and available to staff, children, parents and carers, including on the school website,
- Should enable children and young people to report abuse, neglect, bullying and child-on-child abuse confidently, knowing concerns will be taken seriously and acted upon,
- Should be supported by effective policies and procedures, including:
    - The staff Code of Conduct
    - Positive Behaviour Management Policy, including bullying prevention and the use of reasonable force
    - Prevent Policy
    - Online Safety, AI and Appropriate Use Policy, including monitoring and filtering
    - Mental Health and Wellbeing Policies
    - Supporting pupils with medical conditions
    - Safer Recruitment procedures including the definitions of regulated activity (Refer to part 3 of KCSIE)

- Managing Allegations and Low-Level Concerns Policy
- Attendance, Children Missing Education and Elective Home Education Policy
- Equality Policy and objectives, including schools approach to supporting children who are questioning their gender
- Mobile Phone Policy
- Child-on-Child Abuse and Sexual Violence and Harassment Policy
- Education Other Than at School (EOTAS) / Section 19 Policy

1.4.2 Staff training

Safeguarding is everyone's responsibility, and all school staff are part of a wider safeguarding system for children. As such, staff are expected to regularly undertake training to ensure they have the knowledge and skills to effectively carry out their roles. Staff working within maintained schools are expected to complete the core, mandatory training as listed in the table below.

Core and Mandatory Training

Annual Safeguarding Update incorporating changes to KCSIE	All School Staff/ Volunteers and Governors	Delivered by DSLs	Training material provided by Local Authority	Annually
Level 2 Safeguarding Children (Online)	School staff, incorporating early years staff	Online Delivery:	Virtual College: https://wfscp.org.uk/learning-and-development/e-learning	On appointment and every 2 years
WFSCP Working Together to Safeguard Children: Level 3	DSLs and Deputy DSLs	Face to Face Delivery	https://wfscp.org.uk/learning-and-development/face-to-face	Every 2 years
DSL Induction	New DSLs and Deputy DSLs	Face to Face	Delivered by Education Safeguarding Advisor	On appointment
Prevent	All School Staff/ Volunteers and Governors	Online Delivery	You can access this training via the government site on Prevent duty training - GOV.UK under "Prevent duty training" or via the e-learning module offered by Virtual College entitled: Radicalisation and Extremism (Prevent). https://wfscp.org.uk/learning-and-development/e-learning	Every 2 Years
Safer Recruitment	For those staff/governors with recruitment responsibilities	Online Delivery	Virtual College: https://wfscp.org.uk/learning-and-development/e-learning	Every 2 years
Family Help Training	DSLs and Deputy DSLs	Online or in person	Family Help Partnership Training Offer: https://wfscp.org.uk/learning-and-development/face-to-face	Once

1.4.3 Supplementary Training

Further training on domestic abuse, substance use, neglect, trauma and contextual safeguarding training is available by visiting: https://wfscp.org.uk/learning-and-development/face-to-face

- The Annual Safeguarding Update, incorporating KCSIE changes is delivered annually by the DSL. Staff unable to attend will receive updates from the DSL or deputy DSL to ensure awareness of current guidance relevant to their role.
- The DSL will provide regular updates to school staff on key safeguarding issues impacting on the welfare of children attending the school or issues within the wider Westmorland and Furness area, through regular briefings and targeted training.
- Supply teachers, trainee teachers, volunteers, visitors and contractors will be provided, when they sign in, with accessible information that sets out their responsibilities to report any concerns about a child or the conduct of any adult working in or on behalf of the school.

1.4.4 Quality assurance

- The DSL will review this policy annually and present to the governing body/board of trustees for approval.
- The DSL will complete an annual safeguarding audit, including online safety risk, and report findings to the governing body.
- The DSL and safeguarding link governor will meet termly to review safeguarding activity and challenges.
- The governing body/board of trustees will undertake its own audit of safeguarding effectiveness and statutory compliance.
- The school will complete the bi-annual Section 11 Children Act 2004 safeguarding audit coordinated by the Westmorland and Furness Safeguarding Children Partnership (WFSCP).

Part Two: Identifying Vulnerable Children and Young People in Need

2.1 What all staff should know

All staff working at the school:

- Should know who the designated and deputy safeguarding lead(s) are and how to contact them,
- Should know who the chair of governors/trustees is and how to contact them,
- Should know who the safeguarding link governor is and how to contact them,
- Staff working directly with children and young people must read Keeping Children Safe in Education (2026) Part One **Part one: information for all school and college staff** and follow reporting procedures,

- Other staff must also read the document and follow reporting procedures,
- Must read and understand this policy annually and complete safeguarding training identified by the DSL,
- Should report concerns immediately to the DSL/DDSL and follow the procedure in Appendix Two**,**
- Must adhere to the school's staff code of conduct
- Must be aware of the policy on managing allegations and low-level concerns regarding staff, volunteers, supply staff and contractors, as set out in Part 4 of this policy, including access to the Whistleblowing Advice Line,
- Will receive role-appropriate online safety training including how to keep themselves online e.g., using social media platforms and communication with children, parents and carers,
- Will be aware of the behaviour policy, including bullying, cyberbullying and discriminatory bullying,
- Will understand the importance of attendance and the impact of persistent absence and children/young people missing education,
- Should maintain confidentiality about staff, children and matters affecting the reputation of the school and under no circumstances disclose any information about children outside their designated authority to do so,
- Will be given proportionate and confidential information about children on a need-to-know basis by the designated safeguarding lead to ensure the child's safety and welfare.

2.2 Responding to concerns

2.2.1 General advice and guidance

NB: The term 'staff' refers to all adults within the setting.

- Staff should recognise that children live in different circumstances, including care arrangements, poverty, challenging behaviour and SEND, and ensure personal beliefs do not affect professional judgement,
- Some children experience trauma directly through abuse or indirectly through domestic abuse, parental mental ill health or other adverse experiences,
- Some children are particularly vulnerable, including those who are cared for or previously cared for, young carers, children in alternative provision, those with mental health needs, those at risk of exploitation and LGBTQ+ children experiencing prejudice,
- Some children may already be known to Children's Social Care, police or health services and have plans such as Family Help, Child in Need, EHCP or Child Protection Plans,
- Staff should act in the child's best interests, promote wellbeing and listen to what children communicate through words and behaviour,
- Procedures for reporting concerns are set out in Appendix Three.

2.2.2 Best practice to be followed by all staff

- If a child makes a disclosure, listen carefully, inform the DSL/DDSL promptly and make a factual record including the date, time, location and disclosure details using the child/young person's words wherever possible. You should not promise confidentiality, but reassure the child/young person that you will only tell people who can help and support them,
- A child or young person should never be asked to provide a written account of a disclosure or allegation,
- Staff should feel confident raising concerns about poor or unsafe practice as outlined in Part 4,
- The DSL/DDSL is responsible for referrals to Children's Social Care in line with Working Together to Safeguard Children (2026) and W&FSCP procedures.

2.3 Family Help

Family Help is support provided where a child or family:

- has additional needs,
- has emerging needs,
- requires support beyond the setting's resources and would benefit from a multi-agency response but is not at risk of significant harm.

Any child may benefit from Family Help, particularly those who:

- are disabled or have health conditions,
- have SEND, with or without an EHCP,
- where needs are unclear and these cannot be met from within our own resources alone and they would benefit from a multi-agency response, but not where there is a risk of significant harm,
- are young carers,
- are at risk of anti-social or criminal behaviour, gangs, organised crime or county lines,
- is frequently missing/goes missing from education, home or care,
- have experienced repeated suspensions, are at risk of permanent exclusion, attends alternative provision or a pupil referral unit
- are at risk of modern slavery, trafficking or exploitation,
- are at risk of radicalisation,
- have a parent in custody or affected by parental offending,
- live in families affected by substance misuse, mental ill health or domestic abuse
- misuse alcohol or drugs,
- are at risk of so-called 'honour'-based abuse, including FGM or forced marriage,
- are privately fostered,

The Westmorland and Furness multi-agency threshold guidance sets out local thresholds, assessment processes and services available. Multi-agency threshold guidance | Westmorland and Furness Safeguarding Children Partnership

2.4 Child in Need and in Need of Protection

Westmorland and Furness Council has statutory duties under Working Together to Safeguard Children (2026):

- Under Section 17 of the Children Act 1989, to support children whose health or development is unlikely to reach a satisfactory level without services, or who are disabled,
- Under Section 47 of the Children Act 1989, to investigate where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm,

Children referred to Children's Social Care who meet either threshold should receive an assessment of need and parental impact. Children's Social Care must consider the child's age and understanding when determining services or protective action. The WFSCP has published guidance on Child in Need meetings and Child in Need plans.

2.5 Abuse, Neglect and Exploitation

Abuse and neglect involve harm caused by an adult or another child, or a failure to prevent harm. Abuse can occur within families, institutions, communities or online. Children may also experience harm outside the home through peer groups, neighbourhoods or online environments (contextual safeguarding).
Not all concerns meet the threshold for statutory intervention under Section 47 of the Children Act 1989. However, staff must recognise signs of abuse and take appropriate action.

2.5.1 Definitions of Abuse and Neglect

The statutory definitions of abuse and neglect are set out in Working Together to Safeguard Children (2026). Abuse is maltreatment through inflicting harm or failing to prevent harm. Harm includes non-physical harm such as witnessing the ill treatment of others such as seeing hearing or experiencing domestic abuse. Abuse can also take place in institutions and community, perpetrated by those known to them or, more rarely, by others. Abuse can take place wholly online and be instigated by both adults and other children.

Abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition alone. In most cases, multiple issues will overlap with one another, so it is important that all staff maintain an open mind and professional curiosity as to what might be happening for individuals or groups of children. The ultimate responsibility to assess and determine the type and category of abuse rests with Children's Social Care; our responsibility is to understand the categories of abuse, the impact on the welfare and development of our children and where we have concerns, to take appropriate action as early as possible.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate, criticism, belittling or name calling. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Most sexual abuse is committed by those previously known to the victim. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: 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, for example, 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

Part Three: Additional Safeguarding Responsibilities

3.1 Children with a Disability or Complex Health Needs

Identifying abuse and neglect can be more challenging for children with additional needs, both online and offline. Factors may include:

- Assumptions and lack of professional curiosity about indicators such as behaviour, mood or injury,
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,
- Involvement in child criminal exploitation,
- Communication difficulties that affect reporting abuse or neglect,
- Cognitive understanding, being unable to understand the difference between fact and fiction, then repeating the content/behaviours in the school and not understanding the consequences of doing so.

Staff should be particularly vigilant in safeguarding children with SEND and/or medical needs and discuss concerns with the DSL/DDSL, who will liaise with the SENCo, relevant college lead or Children's Social Care as appropriate.
Further information is available from:

- W&FSCP Website
- Statutory guidance SEND code of practice: 0 to 25 years
- Supporting children at school with medical needs (2015)

3.2 Cared for and previously cared for children and young people

The most common reason for children becoming cared for is as a result of abuse and/or neglect and they will be subject of a legal order e.g., an interim or full care order or under a voluntary arrangement with consent of parents, often called voluntary care; they will have an allocated social worker and have a detailed, statutory, care plan that is reviewed at regular intervals.

Children who have previously been a cared, i.e., they may have been returned home, the care order discharged, and a special guardianship order (SGO) made in place of a care order. For some they may remain potentially vulnerable and require ongoing support to reach their full potential.

All statutory agencies have a responsibility to work together as corporate parents for this group of children and it important to note that some children are place have moved to Westmorland and Furness to live with carers from different local authorities, but they remain the responsibility of the original authority.

The designated safeguarding lead and the designated teacher for cared for and previously cared for children are jointly responsible for this group of children; the designated safeguarding lead to ensure the cared for child is safeguarded and the designated teacher to promote their educational achievement; both have access to detailed information about the child's legal

status; their social worker and contact details; contact with birth parents or those with parental responsibility; care arrangements and the levels of authority delegated to the carer by the placing authority. It is the responsibility of the designated teacher to liaise with the virtual school head for Westmorland and Furness or the virtual head for the placing authority.

Statutory guidance on the role and responsibilities of the designated teacher for looked after and previously looked after children can be accessed here
(*The preferred terminology in W&F Council is "Cared For" children and young person rather than looked after and previously looked after. This is in line with the voice of cared for children who have highlighted they do not like the term looked after. Guidance refers to looked after and previously looked after and to the role of the designated teacher for looked after and previously looked after children*)

3.3 Children who are absent from education

When children are repeatedly absent from education, especially for prolonged periods, this can be a potential and vital indicator of underlying safeguarding issues; early intervention is essential to identify the reason for their poor attendance which can be because of underlying safeguarding risks such as child criminal or sexual exploitation, involvement in county lines or mental health, substance abuse or medical/health needs.

Guidance to support pupils with medical conditions at school can be accessed DfE Supporting pupils with medical conditions at school . Guidance relating to arranging education for children who cannot attend school because of health needs (2023) can accessed here.

3.3.1 Attendance

As a school we recognise and prioritise attendance as a pivotal part of our safeguarding responsibilities. In the majority of cases, children can be supported by the school, but where there are multiple issues requiring an additional multi-agency response the school will make appropriate referrals and seek to identify and provide more intensive whole family support through the provision of early help or where children are persistently absent work with the school attendance support team and virtual school head to develop more formalised attendance support as set out in the W&F Attendance Policy and supporting documents.

3.3.2 Children missing education

The school has a statutory responsibility to co-operate with the local authority to ensure children that are compulsory school age are safe and receiving a suitable education, which includes notifying the local authority when a child:

- Commences or leaves our school at a non-standard transition point,
- Is permanently excluded and to provide a suitable education from day 6,
- Misses ten school days or more without permission.

(See statutory guidance and W&F Attendance Policy)

3.3.3 Alternative Provision

When a student is educated via an AP, the students' registered setting must ensure that written communication is provided to confirm that "full, safer recruitment steps have been taken on all

staff and of arrangements that might put a child at risk – such as new staff joining the AP and the school must ensure that they are aware of the location of their students at all times during school hours.

Placements are reviewed at least half termly to ensure the safety of students and that their needs are met, with the potential that the placement is ended if any concerns are not addressed.

3.4 Domestic Abuse and Operation Encompass

3.4.1 Domestic abuse

Involves a wide range of behaviours that may be a single incident or a pattern of incidents or behaviour, including but not limited to, physical, emotional, psychological and economic abuse and coercive and controlling behaviour. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children and young people who can be victims of domestic abuse through hearing and/or witnessing domestic abuse at home or through experiencing domestic abuse in their own intimate relationships (teenage relationship abuse). The impact of domestic abuse can be far reaching and have a detrimental and long-term impact in relation to their health, wellbeing, including their physical and emotional development and educational outcomes.

3.4.2 Operation Encompass

An initiative that involves the police and schools working together to provide emotional and practical help to children and young people when police respond to an incident of domestic abuse, and they are in present in the household. The police will inform Holme Community School before the commencement of the school day of any incident that has taken place to ensure the school is able to put in place appropriate support.

Operation Encompass does not replace statutory safeguarding procedures for example making a referral to children's social care where there are concerns for a child or young person's welfare.

Further information, guidance and resources can be accessed from:

- NSPCC - signs and the effect of domestic abuse,
- Refuge what is domestic abuse on children,
- Information about how to access specialist support services and getting help for children/young people who may be experiencing domestic abuse in their own relationships,
- Operation Encompass (includes information for schools on the impact of domestic abuse on children,

The procedures for schools to follow, in the event of an Operation Encompass referral can be found in Appendix Seven.

3.5 Child-on-Child Abuse, Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

Children can abuse other children people, at school, in the community or online, and may involve a range of abusive behaviour i.e., physical, emotional or sexual through, but not limited to Sexual violence, sexual harassment and harmful sexual behaviour. This is a safeguarding issue for both the victim and alleged perpetrator. It is important that they receive timely, evidence-based support.

Child to Parent/Care-Giver Abuse
Children/young people may cause harm to adults, often called child to parent or care giver abuse.

3.5.1 Sexual violence

Involves offences as set out in the Sexual Offences Act 2003 whereby a child or young person commits an offence of:

Rape: This includes penetration of the vagina, anus or mouth, without consent (see below).

Assault by Penetration: Of the vagina or anus by a child with their body or anything else and the penetration is sexual without consent.

Sexual Assault: Intentionally touching another person and the touching is sexual, without consent and involves a very wide range of behaviour for example a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent.
Causing someone to engage in sexual activity without consent: This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

3.5.2 Consent

This means having the freedom and capacity to choose, a child under the age of 13 can never consent to any sexual activity: the age of consent is 16 for both male and female: sexual intercourse without consent is rape and consent to any 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 and consent can be withdrawn at any time during sexual activity and each time activity occurs.
Further information about consent can accessed here

3.5.3 Sexual harassment

This involves the 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school and can violate a child's dignity, resulting in them feeling intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Sexual harassment can include but is not limited to sexual comment, including sexual stories, lewd comments, sexual remarks about clothes and appearance or calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against

someone, interfering with someone's clothes and up skirting which is a specific criminal offence and online sexual harassment.

It is important that all staff are aware of inappropriate sexualised conduct that normalises inappropriate behaviours and provides for an environment that may lead to sexual violence; by downplaying behaviours, for example dismissing sexual harassment as "just banter" or "just having a laugh", "part of growing up" or "boys being boys" creates a culture that normalises such behaviour and attitudes which can lead to an unsafe environment for children.

It may also include taking and sharing consensual and non-consensual nude and semi-nude images or video's, often referred to as sexting. The taking and sharing of nude photographs of those aged under 18 is a criminal offence. Recently updated UKCIS advice (March 2024) provides extensive advice and guidance on this issue.

3.5.4 Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent behaviour that is developmentally inappropriate. The umbrella term is "harmful sexual behaviour" (HSB), and it can occur online or face-to-face or simultaneously between the two. When considering harmful sexual behaviour consideration of the ages of the children and their stage of development are critical factors e.g., whether one is older by more than two years or one is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, e.g., where they are disabled or smaller in statue. Addressing inappropriate behaviour and timely intervention helps prevent problematic, abusive or violent behaviour in the future. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma and sometimes have special educational needs that impacts on their understanding of sexual norms and acceptable behaviour.

School is aware of it's critical role and the importance of:

- Recognising the escalatory nature of misogyny and the importance of early identification and support to minimise the risk of harmful sexual behaviour.
- Taking a safeguarding approach in response to all incidents involving the sharing of nudes or semi-nude images regardless of whether they're consensual or not.

The Lucy Faithfull Foundation has produced a HSB toolkit and the NSPCC offers free and independent advice about HSB along with a HSB framework.

3.6 Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and County Lines

Involves an individual or group taking advantage of a child and involves an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs, for the benefit and gain of the perpetrator or gang, which often involves the threat and/or the use of violence towards the victim. CCE and CSE can affect both males and females and often involves them being trafficked for the purpose of exploitation. A child/young person may identify as being part of this group, but are a victim.

CCE and CSE may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child Criminal Exploitation (CCE) involves children being forced or manipulated into transporting drugs or money through county lines (see below), 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. They become trapped by this type of exploitation, as perpetrators threaten them and their families with violence; entrap and coerce them into debt; they may be coerced into carrying weapons such as knives or they carry a knife for protection from others.

Their vulnerability as victims is not always recognised by adults and professionals and they are not treated as victims despite the harm they experience, and their behaviour considered to be a "positive choice" i.e., that they have agreed or consented to their abuse.
Whilst the experience of girls who are criminally exploited can be very different to that of boys and the indicators may not be the same, they too are at risk of criminal exploitation and both may be a higher risk of child sexual exploitation (CSE).

Child Sexual Exploitation (CSE) is child sexual abuse**.** It can be a one-off occurrence (opportunistic) or a series of incidents over time which is often linked to complex and 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. CSE definition and guide for practitioners sets out potential vulnerabilities, indicators of abuse and appropriate action to take in response.

The Home Office has produced a disruption toolkit to support frontline practitioners to safeguarding children/young people from sexual and criminal exploitation.

County lines is a term used to describe gangs and organised criminal networks who exploit children and vulnerable adults to move, store and sell drugs and money through coercion, intimidation, violence or threats of violence, including sexual violence, which often involves the use of weapons to ensure compliance. Children can be targeted and recruited at school, including special schools, FE colleges and higher educational institutions, pupil referral units/alternative provision, children's homes and care homes or via social media platforms.
In addition, The Children's Society has produced a county line a criminal exploitation toolkit.

3.7 Serious Violence

All staff should be aware of the indicators which may indicate children are at risk from or are involved with, serious violent crime. These may include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in educational performance; signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries; unexplained gifts or new possessions could also indicate that children have been approached by or are involved with criminal networks or gangs and may be at risk of criminal exploitation. Serious violence can often peak in the hours just before or after school.

The Home Office has issued guidance in relation to ending gang violence and county lines exploitation, a violent and exploitative form of drug distribution.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or deputy. The DSL should assess the risk and take immediate steps to ensure safety and consider actions de-escalate peer conflict where possible.

3.8 Children/young people with Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides addition information and resources to support children.

3.8.1 Children in the Court System

Some children may be required to give evidence in criminal proceedings as victims or witnesses. The child and family court advisory support service (Cafcass) have produced information and guides to support children and young people.

3.8.2 Child Abduction and Community Safety Incidents

Child abduction can be committed by parents or family members; by people known but not related to the victim (such as neighbours, friends or acquaintances) and more rarely strangers. In addition, community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. However, it is it is important that the curriculum helps to build children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

3.9 Homelessness

Poses a real risk to a child/young person's welfare. The Homelessness Reduction Act 2017 places a legal duty on local councils to provide those who are homeless or at risk of homelessness with meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan and work to help them retain their accommodation or find a new place to live. The new duties shift the focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

3.10 Online Safety

The role played by technology is a significant and recurrent component of safeguarding e.g., abuse and neglect, criminal and child sexual exploitation, our Prevent Duty, child on child abuse (including bullying) and can be a platform that facilitates harm. The breadth of issues classified within online safety are considerable and ever revolving but can be categorised into four areas of risk:

Content: Exposure to illegal, inappropriate or harmful content, misinformation/disinformation ("fake news") and conspiracy theories.

Contact: Being subjected to harmful online interaction with others

Conduct: Online behaviour that increases the likelihood of or causes harm

Commerce: Risks associated with gambling, inappropriate advertising, phishing or financial scams

In addition, children/young people with particular skills and interest in computer and technology may inadvertently or deliberately stray into Cybercrime, criminal activity involving the use of computers or the internet that includes illegal hacking, making a computer, network or website unavailable by overwhelming it with internet traffic and making, supplying or obtaining malware or viruses to commit further offences. Additional advice is available from the national crime agency website and KCSiE 2026 includes guidance on meeting Cyber Security Standards and reference's guidance on Generative AI.

The school takes every reasonable step to provide a safe online environment for pupils to limit exposure to online risks within our own IT system through filtering and monitoring systems, which are regularly reviewed to ensure effectiveness and comply with the DfE filtering and monitoring standards in schools and colleges (2024).

However, online safety is not just about filtering and monitoring but about safeguarding children/young people to keep themselves and others safe online is through the curriculum and ensuring they are equipped to navigate the digital world. Keeping Children Safe in Education (2026) provide details of a range of resources available to schools/colleges.

3.11 Bullying Including Cyberbullying

The Behaviour Management Policy sets out procedures for preventing and managing bullying and cyberbullying. Further guidance and advice is available includes preventing and tackling bullying (2017), Cyberbullying advice for headteachers and school staff (2014) and advice for parents .

3.12 Child and Adolescent Mental Health

The impact of abuse and neglect or other traumatic adverse childhood experiences can have a long-lasting impact throughout childhood, adolescence and into adulthood. Mental health issues can have a detrimental impact on a child's behaviour, attendance and progress at school and may be compounded by SEND.

Mental health problems may develop into safeguarding concerns, including self-harm, suicidal ideation and risk of suicide.

Staff should be vigilant to warning signs including significant changes in behaviour, difficulty sleeping and physical signs of self-harm.

Support, information and resources available to schools and colleges includes:
Promoting and supporting mental health and wellbeing in schools and colleges (updated 2024) with links to curriculum teaching and learning resources, to promote positive health, wellbeing and resilience among children and young people.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, but staff are well placed to observe children on a daily basis and identify behaviour that suggests that they may be experiencing a mental health problem or be at risk of developing one. Mental health support teams (MHSTs) provide additional capacity for early support to meet the mental health needs of children and young, delivering evidence-based interventions, help mental health leads in schools to develop a whole school approach, provide advice and liaise with external specialist services. More information is available here. The school has a senior health lead who has completed accredited DfE training as part of our ongoing commitment to support the mental health of our children.
Further information is available on the Families Information and Young Minds.

3.13 Private Fostering

Relates to a child or young person under 16 years (18 years if they have a SEND) is cared for by someone who is not the child's parent or person with parental responsibility or a relative for a period of 28 days. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity. The school has a statutory responsibility to notify children's social care of any private fostering arrangements that may come to our attention in order for children's social care to undertake an assessment to ensure the needs and welfare of the child are being met and the adults caring for them have access to advice and support. The WFSCP procedures set out the responsibility of the school to notify children's social care.

3.14 Honour Based Violence – Female Genital mutilation (FGM), Forced Marriage and Breast Ironing

Are cultural practices, motivated to protect or defend the honour of the family and/or the community. All forms of so-called honour-based violence are abuse (regardless of the motivation) and should be escalated to children's social care and/or the police.

3.14.1 Female Genital Mutilation (FGM)

This is abuse and comprises of procedures involving the partial or total removal of the external female genitalia and other injuries to the female genital organs, the practice is illegal in the UK and its illegal for a child to be taken from the UK abroad for the purposes of FGM. FGM has long-lasting and harmful consequences, and it is imperative that if staff have any concerns that FGM has taken place or may take place that they refer their concerns to the designated or deputy designated safeguarding lead. There is a specific legal duty on teachers, mandatory reporting,

whereby an act of FGM appears to have been carried out on a girl under the age of 18, the teacher report this to the police. See W&FCSP website for reporting procedure details.

3.14.2 Forced marriage

This is not to be confused with an arranged marriage which is consensual, forced marriage is a crime and involves individuals entering into a marriage without the full and free consent of one or both parties. A forced marriage often involves, threats of or actual violence, other forms of coercion and children with SEND can be particularly vulnerable to forced marriages especially when they are transitioning between child and adult services. It is illegal to coerce, use violence or force someone into marriage against their free will. The Forced Marriage Unit has published multi-agency guidelines and WFSCP procedures can be accessed here.

3.14.3 Breast ironing

This is physical abuse and involves young pubescent girls' breasts being ironed, massaged, flattened and/or pounded down over a period (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely. In many cases, the abuser thinks they are doing something good for the child by delaying the effects of puberty and the practice is designed to make teenage girls look less "womanly", prevent pregnancy and rape, enable the girl to continue her education, prevent dishonour being brought upon the family if the girl begins sexual relations outside of marriage or deter unwanted attention.

3.15 Prevent Duty, Radicalisation and Channel Panel

As a part of our wider safeguarding duties the school has a duty to protect children/young people from being exposed to extremist ideology.

3.15.1 The Prevent Duty

Section 26 of the Counter Terrorism and Security Act (2015) places a duty on schools to have "due regard to the need to prevent people from being drawn into terrorism". The designated and deputy safeguarding leads, senior leaders and governors/trustees in settings, including those providing childcare, must be familiar the Prevent duty guidance (2024).

3.15.2 Radicalisation

This refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. that challenges the fundamental British values of democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and belief. Although there is no single way of identifying whether a child is more or less likely to be susceptible to extremist ideology, possible indicators such as background and exposure to specific influences e.g. family and friends, specific vulnerability e.g. SEND, children who are socially isolated or have unfettered access to online influences on social media and the internet within the home or on mobile phones can be major factors in their radicalisation. Get help for radicalisation concerns (2024) provides guidance and signposts to resources to support

schools and the London Grid for Learning has a number of resources including act early stories, educational activities and lessons to promote critical thinking.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the designated or deputy safeguarding lead making a referral to the Channel programme.

The channel programme focuses on providing support at an early stage for children identified as being vulnerable to being drawn into terrorism. Support is accessed via the multi-agency channel panel which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the channel panel to help with this assessment.

Where there are concerns about a child and they are moving to a new school the designated safeguarding lead will determine whether to share any information with the new school in order for appropriate support to be put in place or those who are already receiving support through the channel programme for that support to continue.
Further guidance and resources, including curriculum resources, can be access via Educate against hate .

Part Four: Managing allegations and low-level concerns in relation to staff, supply staff, trainee teachers, volunteers and contractors

At [Any School] we adopt and implements the principles of safer recruitment to ensure that our procedures and processes are robust in order to deter and prevent people who are unsuitable to work with children/young people from applying to work at our setting securing employment or undertaking volunteering opportunities in our school.

The School Staffing (England) Regulations 2009 require governing bodies of maintained schools to have at least one member of the recruitment panel to have completed safer recruitment training. All staff and governors who are engaged in the recruitment of staff have completed safer recruitment training.

We are committed to promoting an open and transparent culture of ongoing vigilance, whereby staff feel confident and are supported to report any concerns about the conduct or behaviour of staff, volunteers, contractors and supply staff, such concerns should be reported to the Head/Principal.

Part 4 of Keeping Children Safe in Education (2026) sets out in full the statutory guidance for school to manage safeguarding concerns or allegations against those working in or on behalf of **Holme Community School** in a paid or unpaid capacity, i.e. members of staff, including supply teachers, trainee teachers, volunteers and contractors. This includes persons not directly employed by the school, where safeguarding responsibilities are shared with the employing agency, business or teacher training provider.

In addition, Working Together to Safeguard Children (2026) sets out the role of the Local Authority Designated Officer, (LADO) who provides management and oversight of allegations against people who work with children in accordance with Westmorland and Furness Safeguarding Children Partnership's multi-agency procedures and the school's policy for managing allegations and low level concerns.

High profile public enquiries and serious case reviews (now called safeguarding practice reviews) have identified barriers for staff within in organisations to report concerns, the NSPCC operate a whistleblowing advice line to support individuals when

- They have concerns as to how child protection issues are being handled within the school or,
- Have concerns relating to the conduct and behaviour of individuals.

The Whistleblowing advice Line can be reached on **0800 028 0285**; more information is set out at Appendix Five. As part of our approach to ongoing vigilance, all staff and visitors are made aware of how to access the whistleblowing helpline.

4.1 Duty of care

There are two aspects to consider when an allegation is made:

- The welfare of the child
- Investigating and supporting the person subject to the allegation.

4.2 What staff should do if they have concerns about the behaviour of an individual(s)

If you have concerns relating to an individual's conduct or behaviour, whether they be a colleague, member of the management or senior leadership team, governor or a visitor, you should refer your concerns to Headteacher following the procedure set out at below. If concerns relate to the headteacher, then this should be reported directly to the chair of governors who should liaise directly with the local authority designated officer (LADO).

4.3 Thresholds for the management of allegations

The statutory guidance is set out in two parts:

Concerns or allegations that meet the Harm Threshold
Concerns that relate to the quality of care or practice that may indicate a person poses a risk of harm, to children/young people. This part of the guidance applies where it is alleged that anyone working in a setting that provides education for persons under 18 years of age, has:

- Behaved in a way that has harmed or may have harmed a child/young person,
- Possibly committed a criminal offence against or related to a child/young person,
- Behaved towards children/young people 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/young people, including behaviour that may have happened outside of the setting.

The procedure for managing allegations or concerns that meet the harm threshold is set out below.

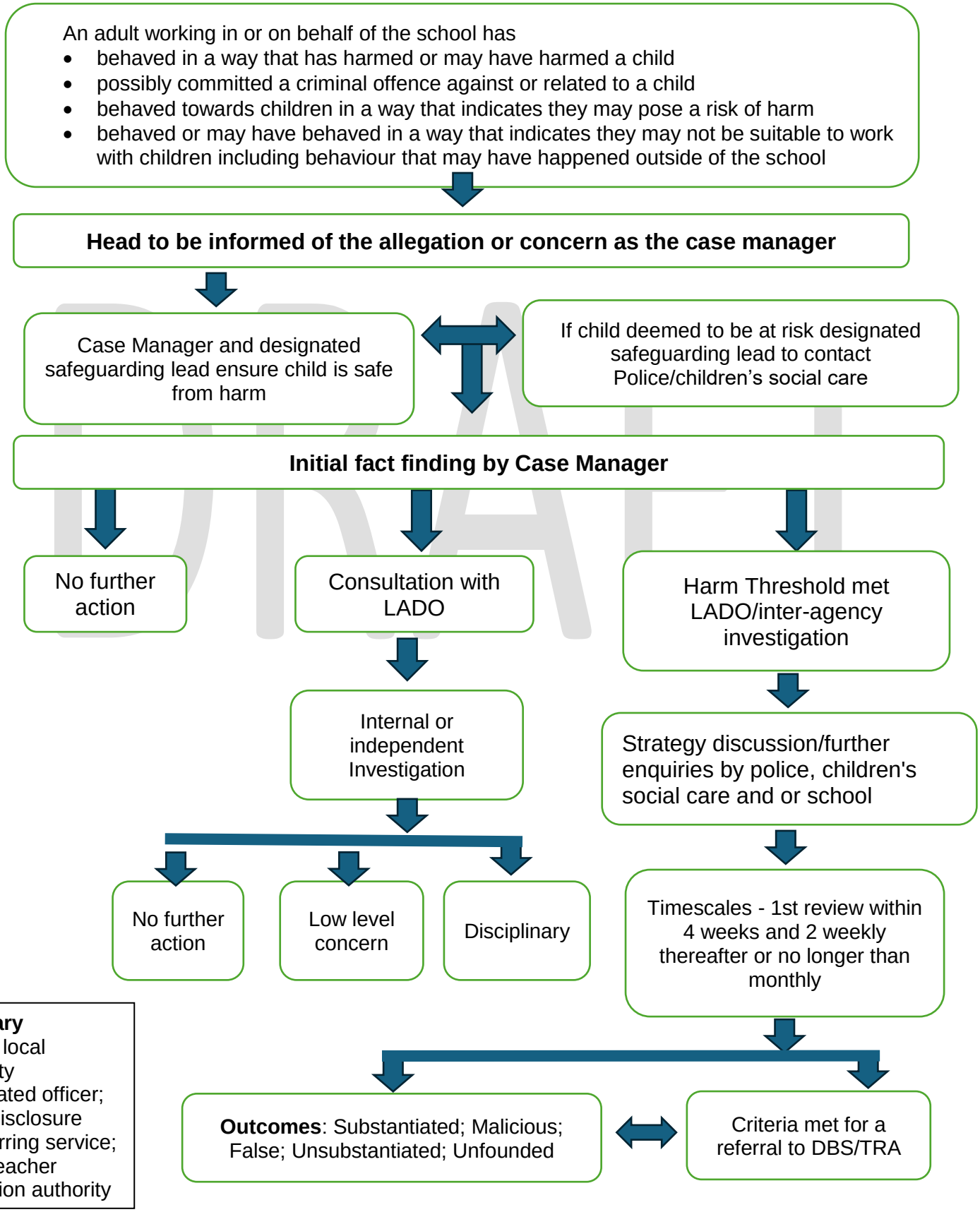
Low Level Concerns that do <u>not</u> meet the Harm Threshold

This relates to concerns, no matter how small, even if no more than 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

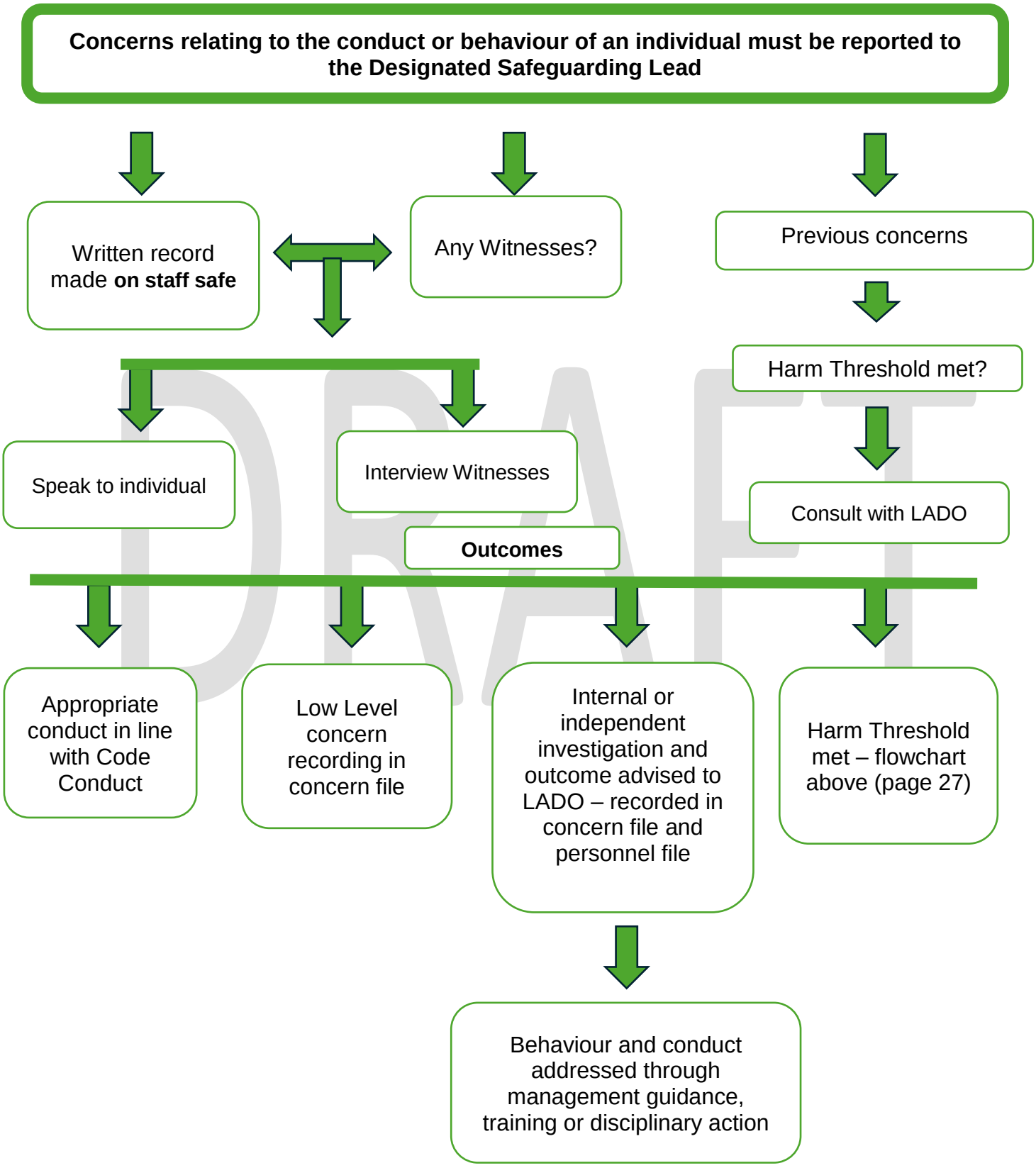
Such behaviour can exist on a wide spectrum and may involve, but not limited to, being overly friendly with children, having favourites, acting in a way that is contrary to school policy, taking photographs of children on personal mobile phones, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, humiliating children, from the unintentional or inconsiderate behaviour that may look to be inappropriate, but might not be in specific circumstances, but may ultimately be intended to enable abuse

Appendix One: Concerns and allegations that meet the harm threshold



Glossary
LADO: local authority designated officer;
DBS: disclosure and barring service;
TRA: teacher regulation authority

Appendix Two: Low level concerns



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Appendix three: What to do if you have a concern

Action to be taken where there are concerns in relation to the safety and welfare of a child

If you have a concern about a child, you must take appropriate action and share your concerns. At Holme School we always act in the best interests of the child their welfare is always paramount

Is the child/young person at immediate risk of harm?

No

Discuss your concern(s) with the DSL or DDSL You must record your concern on CPOMs the same day

Action taken will be based on information or previous concerns held by the DSL/DDSL may result in

- Support and monitoring, using our resources e.g., access to universal services, pastoral support
- A referral to the Family Help Services – see Appendix 2
- Statutory intervention
  - Making a referral to CSC following WFSCP multi-agency procedures
    - Section 17 Child in Need
    - Section 47 Child Protection

Yes

The DSL or DDSL must be informed immediately: if in exceptional circumstances, the DSL or DDSL are not available, this should not delay appropriate action being taken which may include calling the Police or CSC

Contact details

- W&F Children's Hub on **0300 373 2724**
- CSC EDT, out of hours, weekends and Bank Holidays:
- Police: 999

You must complete the child welfare concern form and forward electronically to the DSL /DDSL within one working day

The DSL or DDSL will consider what information is already known; indicators of risk and follow WFSCP multi-agency guidelines when considering what action to take

Glossary:
DSL: Designated Safeguarding Lead and DDSL: Deputy Safeguarding Lead
CSC: Children's Social Care
WFSCP: Westmorland and Furness Safeguarding Children Partnership
W&F: Westmorland and Furness Council
EDT: Emergency Duty Team

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Appendix Four: Family Help Pathway

Family Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Family Help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse.

Child/young person or family have additional needs, emerging needs or their needs are unclear
Refer to the Westmorland and Furness Threshold Guidance

Discuss concerns with the designated or deputy safeguarding lead:

- What are we worried about?
- What is the impact for the child/young person
- What action have taken?

Additional advice and guidance are available from the Family Help Team, **you do not need consent to discuss concerns**

Family Help Team advice is no referral and school continue to support child and family to resolve concerns

Threshold for Family Help Assessment met

Consent to make a referral for Family Help
you must seek the consent of a parent or young person over 13 years old who has capacity, to share their information with another service.

More information and guidance on information sharing can be found here

Consent to a referral is refused the school must continue to support and monitor. The WFSCP webpage 'Family Help and Family Support Panel' can assist you to find the right support to help children/young people and their families

An Your Family Help Assessment - The completion of an EHA would trigger a collaborative response from different agencies, with the child or young person at the centre. A date will be set for a Team Around the Family (TAF) meeting, in order to identify a coordinator, agree the wellbeing plan, and which agency will work in partnership with the family and network to achieve each of the wellbeing goals.

If concerns continue to escalate and the family refuse to engage in family help the designated safeguarding lead should consider next steps and whether the threshold for a child in need or child protection (Level 4) referral in consultation with Children's Social Care has been reached

Where complex and multiple needs emerge, additional support can be sought from the family Help and Family Support Panels

Further details of support and help can be accessed here

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Appendix Five: NSPCC Helpline

NSPCC Helpline

Dedicated Whistleblowing Advice Line

What is whistleblowing?

Whistleblowing is when someone reports wrongdoing on the basis that it is in the public interest for the concern to be brought to light. This is usually something they've seen at work but not always. The situation or incident that needs reporting might have happened in the past, be happening now, or be something the whistleblower is concerned may happen in the near future.

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Contact the Whistleblowing Advice Line if:

- your organisation or another organisation doesn't have clear safeguarding procedures to follow
- concerns aren't dealt with properly or may be covered up
- a concern that was raised hasn't been acted upon
- you're worried about being treated unfairly.

You can contact the Advice Line about an incident that happened in the past, is happening now, or you believe may happen in the future.

If you think an organisation is putting children at risk, even if you're not certain, call the Whistleblowing Advice Line to talk through your concerns. You don't have to share your details, and if you do you can ask for them not to be shared with other agencies.

How to contact the Whistleblowing Advice Line

The Whistleblowing Advice Line is available from 8am-8pm Monday to Friday and 9am-6pm at the weekend.

Call 0800 028 0285 Email help@nspcc.org.uk

Appendix Seven: Operation Encompass Flowchart

