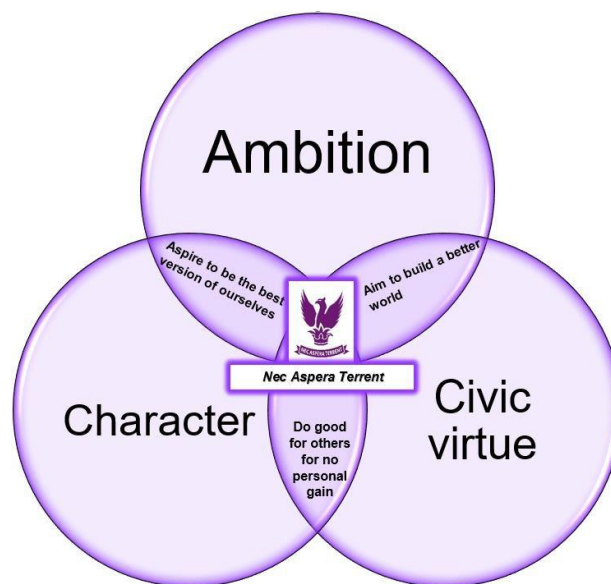




# DRAYTON MANOR HIGH SCHOOL

## CHILD PROTECTION AND SAFEGUARDING CHILDREN POLICY

September 2025



Reviewed by the Full Governing Body: 2 October 2025  
Date of next review: October 2026

## CHILD PROTECTION AND SAFEGUARDING CHILDREN POLICY

Designated Safeguarding Lead (DSL)	Colleen Guitane (Deputy Head) 0208 357 1900
Deputy Designated Safeguarding Lead (DDSL)	Ross Boniface 0208 357 1900
Deputy Designated Safeguarding Lead (DDSL) (Digital)	Juan Delgado (Assistant Head) 0208 357 1900
Governor responsible for safeguarding	Jonathan Eva <a href="mailto:cog@draytonmanorhighschool.co.uk">cog@draytonmanorhighschool.co.uk</a>
Contact the safeguarding team	<a href="mailto:safeguarding@draytonmanorhighschool.co.uk">safeguarding@draytonmanorhighschool.co.uk</a>

### Statement of Purpose

This policy applies to all staff, governors and volunteers working in the school. Drayton Manor High School fully recognises its responsibility to safeguard and promote the welfare of all children and young people and the role it plays in the wider safeguarding system. The school will ensure it creates a culture of vigilance and that all necessary steps are taken to protect children and young people from harm so that every child and young person who attends the school should be able to participate in an enjoyable and safe environment and be protected from harm. To this end we will

- ensure we practice safe recruitment in checking the suitability of staff and volunteers to work with children
- educate children about how to keep themselves safe, including online through various teaching and learning opportunities
- develop and then implement procedures for identifying and reporting cases, or suspected cases, of abuse
- support students who have been abused in accordance with their agreed child protection plan
- establish and maintain a safe environment in which children can learn, develop and achieve and where they are listened to
- ensure that all teaching and support staff are aware of the signs and symptoms of abuse, know the correct procedure for referring concerns, or reporting any allegations against staff and receive appropriate training to enable them to carry out these requirements
- assess the risks and issues in the wider community when considering the well-being and safety of our students
- staff in the school will take all welfare concerns seriously and encourage children and young people to talk about their worries
- always act in the best interest of the child

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment
- 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

- providing help and support to meet the needs of children as soon as problems emerge, whether that is within or outside the home, including online

(Keeping Children Safe in Education 2025)

## Principles

We will follow the procedures set out in 'Keeping Children Safe in Education' (September 2025), 'Working Together to Safeguard Children' (2023) 'the Children's Act (2002, Section 175), the Prevent Duty (June 2023), by the Ealing Safeguarding Children board and take account of guidance issued by the Department for Education to

- ensure it has a Designated Safeguarding Lead (DSL) who will undertake regular, appropriate training for this role
- ensure it has a member of staff who will act in the absence of the DSL
- ensure it has a nominated governor responsible for safeguarding children
- ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and understands their role
- ensure all staff and volunteers (through the induction programme for teachers and support staff) understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL
- ensure that parents have an understanding of the responsibility placed on the school and staff for safeguarding by setting out its obligations in the school prospectus
- notify social services if there is an unexplained absence of more than three days of a student who is on the Safeguarding Overview
- develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at strategy meetings, initial case conferences, and review meetings
- ensure that the duty of care towards its students and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice
- develop and then follow procedures where an allegation is made against a member of staff or volunteer
- ensure safer recruitment practices are always followed
- ensure all staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online) which may have implications for the safeguarding of children

Some children have an increased risk of abuse including online, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeated occasions.
- Have a parent/carers that has expressed an intention to remove them from school to be home educate

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

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

At Drayton Manor High School, we identify and support students who might need more support to be kept safe or to keep themselves safe. We assess the risks and issues in the wider community when considering the well-being and safety of our students, we aim to recognise when they are at risk and know how to get help when they need it.

Staff should share any concerns they have about a child with the Designated Safeguarding Lead or Deputy. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children includes everyone under the age of 18.

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behavior and poor mental health. We take these needs into account when making plans to support students who have a social worker.

The procedures will be reviewed annually and up-dated in accordance with current legislation.

#### Responsibilities

The Governing Body will nominate a member to be responsible for Safeguarding Children and liaise with the DSL in matters relating to Safeguarding. It will ensure that Safeguarding Policies and procedures are in place, available to parents and reviewed annually. The Governing Body ensures that all statutory duties with regards to child protection and safeguarding are fulfilled, in line with Children Act 2004.

Members of the Governing Body will take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in school are effective.' This training is regularly updated.

The School will carry out a full audit of its safeguarding procedures every two years and a light touch audit annually.

The Head will ensure that the Safeguarding policies and procedures are in line with statutory requirements, fully implemented and followed by all staff and that sufficient resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to Safeguarding.

Students and parents will be expected to be aware of and comply with the school's safeguarding, child protection and conduct policies.

The DSL will co-ordinate action on safeguarding and promoting the welfare of students within the school ensuring that all staff, volunteers and visitors to the school know who the DSL is and who acts in his/her absence, they are aware of their responsibilities in being alert to the signs of abuse and of their responsibility to report and record any concerns. The DSL, in conjunction with the Site Manager and Data and Finance Manager, will also seek assurance that appropriate Safeguarding policies and procedures are in place for organisations which use the school site both inside and outside of normal school hours and that such organisations have carried out the relevant recruitment checks on their staff.

#### Role of the Designated Safeguarding Lead

Governing bodies and proprietors should ensure that the school or college designates an appropriate senior member of staff to take lead responsibility for safeguarding and child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

This role is known as the Designated Safeguarding Lead (DSL) and will be held by a member of the Senior Leadership Team. In the event that the DSL is unavailable the responsibilities associated with this role will be carried out by the Deputy DSL.

The broad areas of responsibility for the Designated Safeguarding Lead are

- managing referrals from school staff or any others from outside the school
- work with external agencies and professionals on matter of safety and safeguarding
- undertake training
- raise awareness of safeguarding and child protection amongst the staff and students
- ensure that child protection information is transferred to the student's new school
- referring all cases of suspected abuse to the local authority children's social care
- liaising with the Head to inform him or her of issues especially ongoing enquiries and police investigations
- acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- have an understanding of the filtering and monitoring systems and processes in place

The Role of the Headteacher

The headteacher is responsible for the implementation of this policy, including

- ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- communicating this policy to parents when their child joins the school and via the school website
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix D)

The Role of the Virtual Headteacher

- The Virtual Head teacher has responsibility to promote the education of children who have a social worker and for those with kinship care arrangements

Training

The Designated Safeguarding Lead should receive appropriate training carried out every two years in order to

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to and understands the school's Child Protection and Safeguarding policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- be able to keep detailed, accurate, secure written records of concerns and referrals
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them

In addition to formal training the knowledge and skills for the DSL should be updated at regular intervals, but at least annually, to keep up with any developments relevant to the role.

All staff receive safeguarding and child protection training at regular intervals and at least annually.

The school recognises the need to train all staff to be aware of the incidence, gravity, signs, symptoms, nature and categories of abuse and in the way to deal with the disclosure of abuse. This will take place every year, with colleagues and teachers new to the school receiving training as part of the induction programme to include the Child Protection and Safeguarding Policy, the Code of Conduct, Children Missing in Education, the role of the DSL and the Behaviour Policy. Staff will receive regular safeguarding updates to provide them with relevant skills and knowledge to safeguard children effectively.

The Children Act 2004 defines a child as anyone who has not reached their 18<sup>th</sup> birthday. The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection.

#### Raising Awareness

The Designated Safeguarding Lead should ensure the School's policies are known and used appropriately to

- ensure the Safeguarding and Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, working with the Governing Body in this regard
- ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the Local Safeguarding Children Board (LSCB) to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- where children leave the school ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained
- be aware of students who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school leadership staff

#### Safer Recruitment and Selection of Staff

The school has written recruitment and selection policies and procedures that link explicitly to this policy. A safeguarding statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs. The recruitment process is robust in seeking to establish the commitment of candidates to support the school's measures to safeguard children and to deter, reject or identify people who might abuse children or are otherwise unsuited to work with them.

On appointment, staff are provided with copies of:

- Keeping Children Safe in Education (September 2025)
- Child Protection and Safeguarding Policy
- Code of Conduct
- Managing Allegations against Staff
- Low Level Concerns Policy
- Attendance and Punctuality
- Behaviour policy
- Anti-Bullying policy

- Safer Recruitment Policy
- Emergency procedure
- Online Policy

all of which they must read and acknowledge they have done so, to Human Resources. Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

#### Disqualified by Association

In October 2014, the government issued supplementary guidance to 'Keeping Children Safe in Education (2014)'. School staff are disqualified from working in a school, when they 'live or work in the same household' as someone who is barred from working with children or young people, even if they would not otherwise be disqualified themselves. In September 2018 this guidance was changed and there is no longer a requirement for staff in educational settings to disclose. The duty is now only applicable in a residential setting such as child minders in their own home.

#### Information Sharing and Confidentiality

- the school recognises that all matters relating to Child Protection and Safeguarding are confidential
- disclosure of any safeguarding information about a student to other members of staff will be on a need to know basis only
- all staff must be aware that they have a professional responsibility to share information both in school and with other agencies in order to safeguard children, as no single professional can have a full picture of a child's needs and circumstances
- all staff must be aware that they cannot promise a child to keep secrets

Keeping Children Safe in Education (2024), paragraph 78 states: 'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. 'Keeping Children Safe in Education (2025)'

It should be noted that: 'This includes allowing practitioners to share information without consent...' paragraph 8

#### Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school and then shredded. Child Protection files are transferred to new schools, colleges or Local education authority when a child leaves the school and a receipt requested. This is based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).

#### Supporting Students

Students who are abused or witness violence may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the student through

- the content of the curriculum
- the school ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued
- the school's Behaviour Policy which is aimed at supporting vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable, but they are valued and not to be blamed for any abuse which has occurred
- liaison with other agencies that support the student such as Children's Services, Early Help and Assessment Service (EHAP), Supportive Actions for Families in Ealing (SAFE), Child and Adolescent Mental Health Service (CAMHS), education welfare service, Children Missing Education Service (CME) and Ealing Educational Psychology service, Clinical Psychology in Schools (Clips) and those agencies involved in the safeguarding of children
- notifying Children's Social Care immediately if there is a significant concern
- providing continuing support to a student about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the student's new school
- recognising when they are at risk and how to get help when they need it
- where students have experienced multiple suspensions, are at risk of being permanently excluded from school, and in Alternative Provision or a Pupil Referral Unit
- The school assesses the risks and issues in the wider community when consider the well-being and safety of its students

We recognise that school staff are well placed to observe young people and note the outward signs and symptoms that could lead to the early detection of abuse. Furthermore, school staff are in the position to identify concerns by sharing information and taking prompt action, in order to help children and families receive help at the right time. The school will therefore

- establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to
- ensure students know that there are adults in the school who they can approach if they are worried
- ensure students are taught about safeguarding, including online through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Students are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with additional needs or disabilities.
- include opportunities in the SHINE curriculum for students to develop the skills they need to recognise when they are at risk, stay safe from abuse and how to get help when they need it
- where we place a student at an alternative provision provider, we will continue to be responsible for the safeguarding of that student and will be satisfied that the placement meets the students needs.
- The schools ensures safeguarding arrangements are robust for students in Alternative Provision, including regular risk assessments and designated safeguarding contacts

Preventative education is most effective in the context of a whole-school approach that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. We as a school have a clear set of values: Character, Ambition and Civic Virtue which are upheld and demonstrated throughout all aspects of school life. These are underpinned by the school behaviour policy and Team Charter.

The school acknowledges that safeguarding is everybody's responsibility and that the protection of the child is paramount. Parents and/or carers, students and staff should be aware that the school must take any reasonable action to ensure the safety of students and there may be occasions when outside agencies are consulted before parents and/or carers. This policy will be made available to parents and carers via the School's website. Where it is appropriate to do so, will not put a child at risk and is in line with the recommendation of a social worker, parents or carers will be consulted when referrals to Children's Services are made.

### Reporting a Concern

#### If a Child is in Immediate Danger or at Risk of Harm

If you believe that a child is in immediate danger or at risk of harm, you must make a referral to Ealing children's social care and/or the police immediately -anyone can make a referral. You must inform the Designated Safeguarding Lead of the referral as soon as possible and complete the Disclosure and Observation Form.

Please remember that the school is an agent of referral not an agent of investigation. Further information can be found in Appendix A.

All staff have a duty to report their concerns immediately to the Designated Safeguarding Lead who is, Colleen Guitane or in her absence Ross Boniface or Juan Delgado or any other member of the Senior Leadership Team. This should be done where there are concerns about the welfare of a child. When adults in the school have a concern about a child or young person they should complete a hand written Disclosure or Observation Form and hand it immediately and in person to the DSL. Concern Forms can be found electronically on the Staff Intranet as well in a hard copy format in Main Reception and The Staff Room, the DSL should be informed directly. They can be contacted via a radio call from Main Reception

#### If a student discloses abuse

- react calmly
- listen carefully, reassure them that they were right to tell you and take what the child says seriously
- make accurate notes using the student's words, be careful not to put words into the child's mouth by asking leading questions
- advise the student that you will offer support, but you must pass on the information to the Designated Safeguarding Lead who can help them
- report your concerns to the Designated Safeguarding Lead or a senior member of staff including all verbal conversations. This be handwritten on a Disclosure and Observation Form and handed in immediately and in person
- do not leave the student deliberating over the problem
- do not leave the school premises before reporting the concern

- Do not promise confidentiality
- try to investigate or ask leading questions
- use your own words to describe events

## Types of Abuse and Neglect

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

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

### Emotional abuse may involve

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, 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
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

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

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

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.'

Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors

The school takes an 'it could happen here' approach.

At Drayton Manor High School we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the headteacher without delay.

It is a statutory requirement for all staff/ volunteers to pass on any concerns, observations or disclosures regarding a member of staff/volunteer.

If you become aware that a member of staff may have

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

You must complete a handwritten Disclosure and Observation form and pass this to the Head, immediately and in person.

The Head will report all cases of suspected abuse which involve a staff member or volunteer to

- the designated officer(s) for child protection concerns (LADO)
- the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a

child); and/or

- Police (cases where a crime may have been committed)

Should the concern or allegation be against the Head, this must be taken to the Chair of Governors, Jonathan Eva and discussed immediately with the LADO. Further information can be found in Appendix B.

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

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

### **Allegations**

It is an allegation if the person\* has:

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

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

- Allegations should be reported to the LADO 'without delay'.
- Before contacting the LADO, the school will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
- The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Low-level Concerns**

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

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

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

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

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

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

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

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

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

Records will be kept confidential, held securely and comply with the Data Protection Act 2018. The school will decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

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

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

#### Other Relevant Policies

The Governing Body's legal responsibility for safeguarding the welfare of children goes beyond basic child protection procedures. This policy therefore complements and supports a range of other policies including

Safer Recruitment Policy, Selection and DBS Policy  
Code of Conduct Policy  
Low Level Concerns Policy  
Looked After and Previously  
Looked after Children Policy  
Online Safety Policy  
Behaviour Policy  
Anti-Bullying Policy  
Relationship Sex and Health Education Policy  
Drugs policy  
Attendance Policy  
Whistleblowing Policy  
Managing Allegations Against Staff  
Keeping Children Safe in Education (September 2025)

## Specific Safeguarding Issues

### 1. Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

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

#### Symptoms of FGM

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

Indications that FGM may have already taken place may include:

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

FGM is child abuse and illegal contrary to the Female Genital Mutilation act 2003. The school recognises its statutory duty regarding the reporting of FGM Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

Any teacher who discovers that an act of FGM appears to have been carried out on a student under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. The duty does not apply in relation to at risk or suspected cases.

If you suspect that a child may have undergone FGM you must complete a handwritten Disclosure and Observation form and pass this to the DSL, DDSL or Senior Staff, immediately and in person. You will then be asked to call 101 to report the information. If you suspect that a child is in imminent risk of harm you should call 999.

During the phone call

- explain that you are making a report under the FGM mandatory reporting duty and give your details (name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, your role and place of work)
- give details of your organisation's DSL (name, contact details (work telephone number and e-mail address), place of work)
- give the girl's details (name, age/date of birth, address and if applicable, confirm that you have undertaken, or will undertake, safeguarding actions)

## 2. Extremism and Radicalisation

Drayton Manor High School recognises its responsibility regarding extremist views and the radicalisation of students. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. We use the Curriculum to ensure that students understand how people with extreme views share these with others, especially using the internet. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of or susceptible to radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral.

### Recognising Extremism

Early indicators of radicalisation or extremism may include

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

- advocating violence towards others

This list is not exhaustive.

If you have a concerns regarding extremism and/or radicalisation you must complete a handwritten Disclosure and Observation form and pass this to the DSL, DDSL or Senior Staff, immediately and in person. If further referrals are made to the Channel Panel, the school is aware an individual will be required to provide their consent before any support delivered through the programme is provided.

The School will comply with the 'Prevent Strategy' and any other government guidance, in this regard which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

### 3. Children Missing Education (CME)

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse, neglect or exploitation and may also raise concerns about others

safeguarding issues, including the criminal exploitation of children. Drayton Manor High School recognises its responsibility regarding children who go missing or not attending school.

The school is aware that being absent from school, particularly repeatedly and/or for prolonged periods can cause safeguarding issues including the impact on a student's mental health.

We monitor attendance carefully and address poor or irregular attendance without delay. This includes children who are missing from education

We will always follow up with parents/carers when students are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2025) and working together to improve school attendance, the school has:-

1. Staff who understand what to do when children do not attend regularly and have unexplainable and/or persistent absences from education
2. Appropriate policies, procedures and responses for students who go missing from education especially on repeat occasions and/or prolonged periods
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take students off-roll when they:
  - leave school to be home educated (with the relevant safeguarding checks)
  - move away from the school's location
  - remain medically unfit beyond compulsory school age
  - are in custody for four months or more (and will not return to school afterwards); or
  - are permanently excluded

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the student's new school and their expected start date.

The school will

- report lack of attendance when a suitable reason for this has not been given
- monitor vulnerable students
- refer cases to the social services, Police and other such agencies
- work with children, parents and/or carers and agencies where there is a risk that a child might 'run away'

#### 4. Allegations of Abuse Made Against Other Children

The school recognises that children are capable of abusing other children. Through such policies as

- the Behaviour Policy
- the Anti Bullying Policy
- Online Safety Policy.
- Relationship Sex and Health Education Policy and components of the curriculum, it will seek to minimize the risk by challenging any form of derogatory or sexualised language or behaviour
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- ensuring our curriculum helps to educate students about appropriate behaviour and consent
- ensuring students know they can talk to staff confidentially by going to speak to their Tutor or Head of Year
- ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Child-on-child abuse can manifest itself in many ways, including

- |   |   |
|---|---|
| • bullying                                  | • honour based violence (HBV)           |
| • online abuse                              | • physical abuse                        |
| • 'sexting' – Youth produced sexual imagery | • sexual violence and sexual harassment |
| • gender based bullying                     | • initiation type violence (hazing)     |
| • sexual abuse                              |   |

At Drayton Manor High School, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy. The school has procedures to minimise the risk of child on child abuse:

- systems in place for children to confidently report abuse, knowing their concerns will be treated seriously;
- how allegations of child on child abuse will be recorded, investigated, and dealt with
- clear processes as to how victims, perpetrators and any other children affected by child on child abuse will be supported
- a recognition that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported

We recognise that it is more likely that girls will be victims and boys' perpetrators, but that all child on child abuse is unacceptable and will be taken seriously;

Keeping Children Safe in Education 2025 sets out how we as a school should respond to reports of sexual violence and sexual harassment.

Sharing nudes and semi-nudes (previously known as 'sexting')

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)

- Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation.

The different forms child on child abuse can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment

It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the school
- indicates that other students may have been affected by this student
- indicates that young people outside the school may be affected by this student

We will minimise the risk of child on child abuse by

- challenging any form of derogatory or sexualised language or behaviour

- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- ensuring our curriculum helps to educate students about appropriate behaviour and consent
- ensuring students know they can talk to staff confidentially through our Assembly, Tutor Programme and SHINE lessons
- ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

If a student makes an allegation of abuse against another student

- you must tell the DSL and record the allegation, but do not investigate it
- the DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- the DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed. This will include the impact on siblings.
- Subsequent risk assessments will include any actions required to make the location safer.

The School will follow the Behaviour Policy and the statutory guidance in Keeping Children Safe in Education (2025)

### Sexting

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

### 5. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017). The definition is:

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

Indicators of child sexual exploitation may include

- acquisition of money, clothes, mobile phones, etc. without plausible explanation
- gang-association and/or isolation from peers/social networks
- exclusion or unexplained absences/missing from school, college or work
- leaving home/care without explanation and persistently going missing or returning late
- excessive receipt of texts/phone calls
- returning home under the influence of drugs/alcohol
- inappropriate sexualised behaviour for age/sexually transmitted infections
- evidence of/suspicions of physical or sexual assault

- relationships with controlling or significantly older individuals or groups
- multiple callers (unknown adults or peers)
- frequenting areas known for sex work
- concerning use of internet or other social media
- increasing secretiveness around behaviours; and
- perpetrators and alleged perpetrators
- self-harm or significant changes in emotional well-being

Potential vulnerabilities include

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

- having a prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- recent bereavement or loss
- social isolation or social difficulties
- absence of a safe environment to explore sexuality
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other children and young people who are being sexually exploited
- family members or other connections involved in adult sex work
- having a physical or learning disability
- being in care (particularly those in residential care and those with interrupted care histories); and
- sexual identity

More information can be found in Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017).

Staff must report instances which raise concerns.

## 6. Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see point for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;

- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who are perpetrators and alleged perpetrators
- children who regularly miss school or education or do not take part in education.

## 5. County Lines

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

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

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

## 7. Online Safety

An effective approach to online safety empowers a school to protect and educate the whole school in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying

Expanded risks include exposure to misinformation, disinformation, conspiracy theories, and AI-generated content. Schools must meet new Filtering and Monitoring Standards and Cyber Security Standards as outlined in Keeping Children Safe in Education 2025.

Working at home (online learning)

Where children are being asked to learn online at home the Department for Education has provided advice

to support schools to do so safely. Schools should emphasise the importance of a safe online environment and encourage parents and carers to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites. These are usually free, but often need to be turned on.

It's especially important for parents and carers to be aware of what their children are being asked to do online, including:

- sites they will be asked to use
- school staff their child will interact with

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be referred to the Designated Safeguarding Lead or Deputy and where appropriate referrals should continue to be made to children's social care and as required the police.

Keeping teachers safe when providing remote education is also essential. Remote education is a new experience for both staff and students, so it's important that schools understand how to approach safeguarding procedures online. School contact with parents and carers during this time can also be used to reinforce the importance of children staying safe online.

The school recognises its responsibility in protecting children online and educating them on the topics of safeguarding and safe internet use. The school is aware of the Filtering and Monitoring standards, and Cyber Security Standards put in place to support schools to meet its duty to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

When children use the school's network to access the internet, they are protected from inappropriate content by our appropriate filtering and monitoring systems on school devices and school networks. The school will ensure that appropriate filters and monitoring systems are in place which are regularly reviewed for their effectiveness. However, many students are able to access the internet using their own data plan. To minimise inappropriate use, as a school we have students sign an acceptable use agreement and have consequences set out in our behavior policy for any unacceptable use which takes place online. "Further information can be found on the UK Council for Child Internet Safety website. The School does not allow students in Year 7 to 11 to have a mobile phones or any other Internet enabled device, in school. Sixth Form students are allowed, however, they can only be used in the Sixth Form Building.

However, many students are able to access the internet using their own data plan. To minimise inappropriate use, as a school we deliver Online lessons to all year groups and run an Online Safety week in school each year to raise awareness.

The school should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online safety, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. Training for staff will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. All new staff will receive appropriate Online safety training at induction. This will include training on misinformation, disinformation, conspiracy theories, and AI-generated content.

The Designated Safeguarding Lead and Deputy are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.

#### Youth Produced Sexual Imagery 'Sexting'

When an incident involving youth produced sexual imagery comes to the school's attention we follow guidance given to schools by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

- the incident should be referred to the DSL as soon as possible
- the DSL should hold an initial review meeting with appropriate school staff
- there should be subsequent interviews with the young people involved (if appropriate)
- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- at any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately

#### 7.Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (\*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Each party involved in the private fostering arrangement has a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Once the notification has been made to the authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers household. Children's

services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse, exploitation and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

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

Other professionals, for example GPs surgeries and schools, also have a responsibility to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. (see 'Replacement Children Act 1989 Guidance on Private Fostering 2005 paragraph 2.6)

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

Note that although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear who has parental responsibility and on admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## 8.Criminal Exploitation of Children

Criminal exploitation of children is geographically widespread. The majority of child trafficking involves movement across borders; however, it can also take place within the UK.

Exploitation may include

- sexual exploitation
- domestic servitude or labour
- involvement in criminal activity (for example, pick-pocketing)

While some children are coerced many are tricked through promises of education or respectable work. Children are considered trafficking victims regardless of whether they have been forced, deceived, or have submitted willingly. This is because anyone under the age of 18 cannot provide informed consent.

County lines is a specific method of drug supply. County lines relates to the supply of class A drugs (primarily crack cocaine and heroin) from an urban hub into rural towns or county locations. The exploitation of young and vulnerable people is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace (commonly referred to as cuckooing). Should we have reason to believe a student has become involved we will make referrals to both the Police and Social Care.

## 9. Honour Based

So-called 'honour-based' (HB) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HB are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HB, they must contact the Designated Safeguarding Lead as a matter of urgency.

## 10. Forced Marriage

Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents. Once again, schools can be seen as being in the front line in protecting young people from this type of abuse. A student who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear, that the proposed holiday will result in a forced marriage, may only become apparent after a number of conversations. These young women may also become victims of what is termed honour-based violence. This type of violence is described in 'The Right to Choose' guidance as: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community. Forced marriage, here or abroad, is a crime; we will always report to both Police and Children's Social Care.'

**"In addition, since February 2024 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages."**

## 11. Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

### Definition

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

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

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

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Operation Encompass is a partnership between police and schools. One of the principles of Operation Encompass is that all incidents of domestic abuse are shared with schools, not just those where an offence can be identified. We have appointed a trained Key Adult – the Key Adult is the person who receives information about police attended Domestic Abuse incidents. This Key Adult is the Designated Safeguarding Lead. The Designated Safeguarding Lead is notified prior to the start of the next school day that the police have attended an incident of domestic abuse. This timely information sharing enables appropriate support to be provided for that child so that all interactions, from when the child first arrives at the school gates, are of a positive nature. The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

#### 12. Drugs and Alcohol

Drugs include alcohol, tobacco, illegal drugs, medicines, psychoactive substances (“legal highs”), and volatile substances, you are able to search students for drugs, and confiscate them if found. If the substances are not controlled drugs (such as legal highs), you can confiscate them if you believe them to be “harmful or detrimental to good order and discipline”. If you are unable to identify the legal status of a drug, it should be treated as a controlled drug. If you find controlled drugs Inform the DSL as you should have another adult with you as a witness. The DSL will notify the police and ensure all necessary protocols are followed.

#### 13. Faith Abuse

Faith abuse is child abuse linked to faith or belief. This includes

- belief in concepts of witchcraft and spiritual possession, demons or the devil acting through children or leading them astray, the evil eye or djinns and dakini
- ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation
- belief that children’s bad behaviour has brought about bad fortune

If you believe that a child is in immediate danger, you should make a referral to the local authority (LA) children’s social care team and the local police, if appropriate and inform the DSL using the Disclosure and Concern form.

#### 14. Gangs and Youth Violence

Children and young people involved with, or on the edges of gangs, might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations. There are lots of reasons why young people feel the pressure to join gangs. They might be bored and looking for excitement or feel attracted to the status and power it can give them. They might join due to peer pressure, money or family problems. Gang membership can also make a child feel protected and that they belong. For lots of young people, being part of a gang makes

them feel part of a family so they might not want to leave. Even if they do, leaving or attempting to leave can be difficult. They might be frightened about what will happen to them, their friends or their family if they leave. We take gang activity seriously and would respond to concerns about gang membership through multi agency working and appropriate referrals which may include Youth Offending Service, Police and Children's Social Care.

#### 15. Mental Health

Mental health is the concern of the whole community and we recognise that we play a key part in this. We strive to develop emotional wellbeing and resilience in all our students and staff, as well as provide specific support for those with these additional needs. We understand that the risk factors which increase someone's vulnerability along with the protective factors that can promote resiliency. The more key risk factors present in an individual's life; the more protective factors or supportive interventions are required to counter-balance.

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or the deputy. The designated safeguarding lead is also the names Senior Mental Health Lead for Drayton Manor High School.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by completing the Disclosure and Observation Form and speaking to the designated safeguarding lead or the deputy.

#### 16. Fabricated, Induced Illness

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of her/his main carer and which is attributed by the adult to another cause. There are four main ways of the carer fabricating or inducing illness in a child

- fabrication of signs and symptoms, including fabrication of past medical history
- fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluids
- exaggeration of symptoms/real problems. This may lead to unnecessary investigations, treatment and/or special equipment being provided
- induction of illness by a variety of means

Harm to the child may be caused through unnecessary or invasive medical treatment, which may be harmful and possibly dangerous, based on symptoms that are falsely described or deliberately manufactured by the carer, and lack independent corroboration. In cases of suspected Fabricated and Induced Illness we will work closely with other agencies to ensure information is shared appropriately and in a timely manner. Where a child has suffered, or is likely to suffer, significant harm, the school will make a referral to Children's Social Care.

#### 17. Gender based violence/ violence against women/girls (VAWG)

Gender-based violence, also known as violence against women and girls, can include physical and sexual abuse, harassment and bullying. Abuse includes female genital mutilation (FGM), forced marriage and sexting.

As a school, we do not tolerate any form of sexual harassment, sexist language and sexual violence. We do this by

- tackling all gender-based bullying robustly (including sexting and cyberbullying)
- taking all incidents of sexual harassment seriously (not brushing it off as 'teasing' or 'boys will be boys') and taking action against the perpetrators
- challenging harmful comments which normalise abusive behaviour
- training staff in how to promote gender equality and recognise where they may be indirectly discriminating or unconsciously promoting gender stereotypes

#### Children who are lesbian, gay, bisexual or gender questioning

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

Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. At Drayton Manor High School, we endeavour to reduce the additional barriers faced by creating a culture for them to speak to staff.

When supporting Gender questioning children, the school will take a cautious approach and consider the broad range of their individual needs, in parents with the parents and carers (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child) including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The school will refer to DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Families who are making decisions about support for gender questioning children will be supported by the school and encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience. The school will support families with these appropriate referrals with the support of the General Practitioner.

## APPENDIX A

### Action When a Child Has Suffered or is Likely to Suffer Harm

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral.

### Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

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

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

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

## APPENDIX B - ALLEGATIONS INVOLVING SCHOOL STAFF OR VOLUNTEERS

We recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff.

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

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

You must complete a handwritten Disclosure and Observation form and pass this to the Head, (or Designated Safeguarding Lead) immediately and in person. Should the concern or allegation be against the Head, this must be taken to the Chair of Governors, Jonathan Eva and discussed immediately with the LADO.

The procedure set out overleaf will then be followed.

### Low-level Concerns

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

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

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

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

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

The school will follow its low-level concerns policy.

