

De Lacy Primary School Safeguarding & Child Protection Policy 2026-2027

All staff should have access to this policy and sign to the effect that they have read and understood its contents.

Date of last review:	September 2026	Author:	Head of Safeguarding
Date of next review:	July 2027	Owner:	Education Directors
Type of policy:	☐ Network-wide ☐ Set for school ☒ Tailored by school	Approval:	Board
School:	De Lacy Primary School	Key Contact Name:	Nicki Deane
Key Contact Email:	safeguarding@arkonline.org	Key Contact Phone:	01977 722620

POSITIONING WITHIN ARK OPERATIONAL MODEL

Component	Element
☐ Strategic Leadership & Planning ☐ Monitoring, Reporting & Data ☐ Governance & Accountabilities ☐ Teaching & Learning ☐ Curriculum & Assessment ☒ Culture, Ethos & Wellbeing ☐ Pathways & Enrichment ☐ Parents & Community ☐ Finance, IT & Estates ☐ Our People	Safeguarding

Contents

POSITIONING WITHIN ARK OPERATIONAL MODEL	1
Component.....	1
Element.....	1
Safeguarding.....	1
1. Key contacts - De Lacy Primary.....	4
2. What to do if you have a safeguarding concern in De Lacy Primary	6
3. Introduction	7
3.1. Ethos.....	7
3.2. Scope.....	8
3.3. Context	8
3.4. Definition of safeguarding	8
3.5. Meeting the needs of all children	9
4. Key roles and responsibilities	10
4.1. Designated Safeguarding Lead (DSL) /Deputy Designated Safeguarding Lead (DDSL)	10
4.2. The Ark schools trust board	12
4.3. Ark's Head of Safeguarding.....	12
4.4. Principal /Head of School and Executive Principal	13
4.5. Local Governing Body (LGB) / SPRB	14
4.6. Members of Staff	14
4.7. Multi agency safeguarding arrangements.....	15
5. Procedures	16
5.1. Indicators of abuse, neglect and exploitation	16
5.2. Disclosures and concerns	19
5.3. Responding to disclosures.....	20
5.4. Early Help and Targeted Family Help	21
5.5. Behaviour and restrictive intervention	22
5.6. Suspension and permanent exclusion	22
5.7. Child on child incidents	22
5.8. Sexual violence and sexual harassment between children	23
5.9. Consensual and non-consensual sharing of nudes and semi-nude images	26
5.10. Radicalisation.....	27
5.11. Online safety.....	28
5.12 Smartphone free school	30
5.13 Filtering and monitoring.....	30
5.14 Curriculum and staying safe	30
5.15 Out of Hours monitoring and support.....	31
6 Staff training.....	31
7 Supporting staff.....	33
8 Staff conduct	33
9 Managing allegations	33

10	Whistleblowing.....	36
11	Safer recruitment	37
12	Additional vulnerabilities.....	37
12.1	Behaviour	37
12.2	Attendance and children missing education	38
12.3	Mental Health	39
12.4	SEND.....	40
12.5	LGBTQ+	40
12.6	Gender Identity	41
12.7	Children with a social worker	41
12.8	Unexplainable and/or persistent absence from education	42
12.9	Domestic Abuse (DA).....	43
12.10	Safeguarding aged 18 and over	43
13	Record-keeping	44
13.1	CPOMS.....	44
13.2	SENSO	45
13.3	Confidentiality, information sharing and GDPR	45
13.4	Requests for access to safeguarding records	47
13.5	Transferring records.....	48
13.6	Data Breaches	48
14	Appendix A – Ark Contacts	49
15	Appendix B – Policies	50
15.1	Relationships, Sex & Health Education (RSHE)	50
15.2	Intimate care	50
15.3	SEND	50
15.4	Unexplainable and/or persistent absences from education	50
15.5	Recruitment & Appointment Policy 2026/2027	50
15.6	Other Related Policies, Procedures and Guidance.....	51
15.7	Further reading	51
16	Appendix C – Further Information	54
16.1	Looked After Children (referred to as LAC)	54
16.2	Off-site directions and Alternative Provision (AP)	54
16.3	The use of school premises by other organisations.....	55
16.4	Site Security	56
17	Appendix D - Signs and indicators of abuse, neglect and exploitation	56
17.1	What is Child Abuse?	56
17.2	What is abuse and neglect?.....	56
17.3	What is physical abuse?	56
17.4	What is emotional abuse?	57
17.5	What is sexual abuse?	59
17.6	What is Neglect?	60
17.7	Signs and Indicators of CCE/CSE/County Lines.....	61
17.8	Child Criminal Exploitation (CCE)	63

17.8 County Lines.....	64
17.9 Serious Violence.....	64
17.10 Honour Based Abuse (HBA)	65
17.11 Signs and symptoms of Female Genital Mutilation (FGM)	65
5.13. Prejudice based harm and faith targeted abuse	66
17.12 Contextual safeguarding.....	66
17.13 Domestic Abuse.....	67
17.14 Private Fostering	68
17.15 Kinship Care	69
18 Appendix E - Safeguarding Issues that can place children at risk of harm (external links to further guidance/advice).....	70

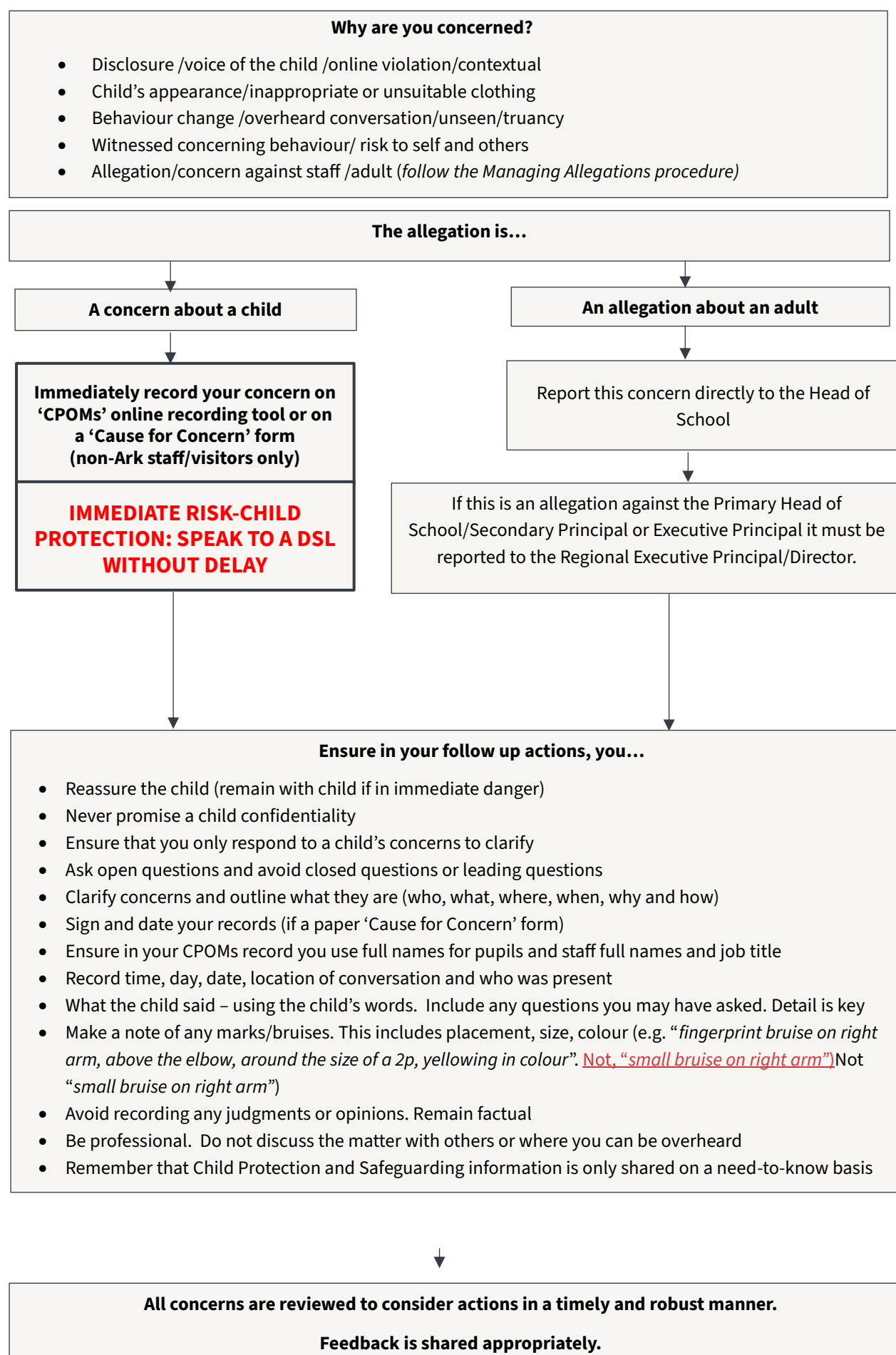
Safeguarding and child protection policy

1. Key contacts - De Lacy Primary

The following list identifies the key contact within the Academy, including individual with designated responsibility for safeguarding and child protection matters.

De Lacy Primary – Key Contacts		
Name	Role	Email
Nicki Deane	Head of School	NDeane@arkdelacy.org.uk
James Parkinson	Executive Principal	JParkinson@arkdelacy.org.uk
Nicki Deane	Designated Safeguarding Lead (DSL)	NDeane@arkdelacy.org.uk
Mr J Parkinson	Deputy DSL	JParkinson@arkdelacy.org.uk
Mr J Shuttleworth		JShuttleworth@arkdelacy.org.uk
Mr C McMahon		CMcMahon@arkcarletonhigh.org.uk
Miss L Middleditch		LMiddleditch@arkdelacy.org.uk
Mrs C Brown		CBrown@arkdelacy.org.uk
Miss N Thorpe		NThorpe@arkdelacy.org.uk
Mrs H Dancey		HDancey@arkdelacy.org.uk
Mr J Shuttleworth	Inclusion Leader	JShuttleworth@arkdelacy.org.uk
Mik Shinn	Safeguarding Link SPRB member	Governance.Team@arkonline.org
Mik Shinn	Chair of SPRB	

2. What to do if you have a safeguarding concern in De Lacy Primary



3. Introduction

3.1. Ethos

De Lacy Primary is a community and all those directly connected (staff, adults, governors, parents, families and pupils) have an essential role to play in making it safe and secure. De Lacy Primary recognises our moral and statutory responsibility to safeguard and promote the welfare of all children with their best interests at the centre of our work.

At De Lacy Primary we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment to help children to feel safe, secure, respected and included; encourage them to talk openly about anything that worries them; and enable them to feel confident that they will be listened to. Adults in our school take all welfare concerns seriously and are alert to the signs of abuse and neglect; and follow our procedures to ensure that children receive effective support, protection and justice.

As stated in Keeping Children Safe in Education Part One, paragraph 60, 'Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.' Staff must have no hesitation in reporting any safeguarding matters and must be able to do so without fear of the consequences to themselves or the school in carrying out their statutory duties. De Lacy Primary will support staff fully to this end.

Our core safeguarding principles are:

- That school is an important part of the wider safeguarding system for children.
- It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern.
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings taken into account.
- All staff understand safe professional practice (inc. role requirements) and adhere to our code of conduct and other associated policies.
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

There are four main elements to our safeguarding policy:

- **Prevention** (e.g., positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

In addition, De Lacy Primary will be required to complete their Local Authority section 175 audit.

3.2. Scope

This policy applies to all staff, supply staff, trainee teachers, volunteers, non-Ark staff, third-party contractors (whose employees or sub-contractors have access to school premises), governors and trustees working in or on behalf of the school, including those from the Ark central team. All references in this document to 'staff' or 'members of staff' or 'adult' should be interpreted as relating to all those specified above. Staff also includes those individuals who educate pupils off-site and when individuals undertake an educational visit with pupils, unless otherwise stated.

Rather than duplicating all content from Keeping Children Safe in Education (KCSIE) 2026 in this policy, it should be understood that the school will always refer to KCSIE as the benchmark for all safeguarding practice and decision-making.

Parents can obtain a hard copy of the Safeguarding and Child Protection Policy, and other related policies can be found on the school's website and on request to the school.

3.3. Context

This policy has been developed in accordance with the following statutory guidance:

- [Keeping children safe in education 2026](#)
- [Working Together to Safeguard Children 2026](#)
- [Children's Wellbeing and Schools Act 2026](#)
- [The Equality Act 2010](#)
- [Use of reasonable force and other restrictive interventions guidance 2026](#)
- [Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement](#)

This policy is also based on:

- Part 3 of the schedule to the [Education \(Independent Schools Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- Section 175/157 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to arrange to safeguard and promote the welfare of all children who are pupils at a school, or who are pupils under 18 years of age, such arrangements will have regard to any guidance issued by the Secretary of State.
- The agreed arrangements published by our three local safeguarding partners
- Complying with our funding agreement and articles of association.

3.4. Definition of safeguarding

Safeguarding and promoting the welfare of children (Page 8, KCSIE 2026 and Working Together to Safeguard Children 2026), means:

- 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
- That children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Child Protection (CP) is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering or likely to suffer significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.

Children includes everyone under the age of 18.

Children in Need (CiN) is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled.

The following three safeguarding partners are defined in the Children Act 2004, specifically following amendments introduced by Chapter 2 of the Children and Social Work Act 2017.

- The Local Authority: Wakefield LA
- Integrated Care Boards (ICBs): Wakefield District Health and Care Board
- Police: West Yorkshire Police

De Lacy Primary acknowledges that safeguarding is what we do for all children.

Every member of staff at De Lacy Primary recognises that children experiencing specific forms of abuse and safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

The school recognises that safeguarding intersects with behaviour, attendance, inclusion and wellbeing. All decisions will consider safeguarding implications in line with KCSIE 2026 and all related guidance and legislation.

3.5. Meeting the needs of all children

Some children have an increased risk of abuse and additional barriers can exist for some children with respect to recognising it 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. All staff are particularly alert to the potential need for Early or Targeted Family Support for a child who:

- has special educational needs or disabilities or health condition (whether or not they have a statutory education, health and care plan - EHCP). These children may be more prone to peer group isolation than other children and therefore additional pastoral support is provided.
- is a young carer
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- is at risk of child abduction, community safety incidents or exploitation

- whose parent/carer has expressed an intention to remove them from school to be home educated
- is showing signs of 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.
- is showing signs of trauma
- has a bereaved parent, grandparent, family member, friend or prominent community link
- may experience discrimination due to their race, ethnicity, religion or heritage
- may experience discrimination due to their gender identification or sexuality (LGBTQ+)
- has English as an additional language
- is post 16 and homeless/'sofa surfing'
- is frequently missing/goes missing from care or home
- is in kinship care (special guardianship), foster care or residential settings, and those experiencing sudden family breakdowns.
- Is previously looked after or has returned home to their family from care (a 'care leaver')
- is at risk of Female Genital Mutilation, sexual exploitation, forced marriage, radicalisation or online grooming
- is an asylum seeker
- is a privately fostered child, special guardianship order or kinship care
- is in a household with domestic abuse, substance misuse, or parental mental health issues dramatically increases a child's vulnerability
- has a parent sent to prison

4. Key roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all adults at De Lacy Primary and is consistent with the procedures of the Local Authority three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

4.1. Designated Safeguarding Lead (DSL) /Deputy Designated Safeguarding Lead (DDSL)

The school has an appointed member of the senior leadership team as the Designated Safeguarding Lead (DSL). The De Lacy Primary DSL is Nicki Deane. The DSL takes lead responsibility for the day-to-day oversight of safeguarding and child protection systems and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the Deputy Designated Safeguarding Leads will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so, ensuring the school is appropriately represented (including Child Protection conferences).
- Contribute to the assessment of children by appropriately sharing information about pupil's welfare, safeguarding or CP concerns with relevant staff and external services.
- Help promote educational outcomes, academic progress by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and leadership staff.
- Contribute to the review of records relevant to freedom of information and subject access requests.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour, violence and harassment.

The DSLs will also:

- Keep the Head of School informed of any safeguarding topics, provide regular data reports, analysis of cases, pattern and trends and informed of any serious safeguarding issues relating to children and staff.
- Liaise with Ark's Head of Safeguarding in reporting serious safeguarding issues relating to children and in matters relating to staff.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's services colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of police attendance in school, investigation or search.

The DSL and DDSs will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and DDSs training will be updated formally every two years but may have refresher training at regular intervals, at least annually, to keep up with any developments relevant to their role and contextual need of the school.

Additionally, the DSL and DDSs knowledge and skills will be updated regularly through a variety of other methods, e.g. participating in conferences, local authority safeguarding forums, other identified training, supervision, Ark network training and Ark DSL forum meetings.

The school appoint additional staff to deputise for the DSLs. The Deputy DSLs attend appropriate training, which enables them to be fully conversant and to fulfil this role. Whilst the activities of the designated safeguarding lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

It is the role of the De Lacy Primary School DSL to:

- **Maintain accurate child case records:** recording concerns, actions, referrals and updates on CPOMs – safeguarding recording tool. Providing oversight and quality assurance of all cases including vulnerable pupils and those with an allocated social worker. Manage and monitor the school's role in Targeted Family Support / Child in Need / Child Protection plans. Monitoring online violations via SENSO/SWGfL. Ensuring regular pupil case analysis from CPOMs is completed to identify themes, impact and learning.
- **Raise awareness about safeguarding:** annual audit, training, briefings, DSL forums, digital strategy/awareness & resilience.
- **To make referrals and liaise with other services:** to strengthen safeguarding response to Local Authority, Family Support, leaver/in-year transition, CAMHS, counselling, universal, targeted, specialist interventions and safeguarding partners and other agencies and professionals as necessary.
- **To support and advise staff:** act as the central contact point for all staff to discuss any safeguarding concerns, code of conduct, position of trust, staff concerns, allegations & vulnerabilities, duty of care, professional curiosity and well-being.
- **Promote teacher awareness:** share relevant safeguarding, welfare and child protection information with teachers to support awareness, inform understanding of pupils' progress, maintain high expectations, and enable appropriate academic support and adjustments.
- **To comply with multi agency expectations:** as set out in Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026, including active engagement in early help, participating in statutory safeguarding arrangements, information sharing and escalation.

The Executive Principal will be kept informed of any significant safeguarding issues that require escalation or where developing patterns/trends or additional needs emerge.

The DSL, where reasonably possible, will hold more than one emergency contact number on Bromcom for each pupil in case of emergencies, and in case there are welfare concerns at the home.

De Lacy Primary DSL and DDSLs follow the full role and responsibilities as set out in 'Keeping Children Safe in Education' 2026, Annex B.

4.2. The Ark schools trust board

The Ark Schools Board retains statutory responsibility for ensuring that all legal responsibilities in connection with Safeguarding are discharged. The Board appoints a Safeguarding Link Trustee to act as the link between the Trustees and Executive team.

4.3. Ark's Head of Safeguarding

The Head of Safeguarding holds responsibility for overseeing day-to-day safeguarding matters within the network, and will ensure schools have appropriate safeguarding processes, practices and relevant training to safeguard and promote the welfare of children.

The Head of Safeguarding will provide schools with high quality safeguarding support, advice and guidance tailored to individual needs and requirements, ensuring schools meet their statutory responsibility to keep children safe.

Ark recognises that staff anxiety around child protection can undermine good practice and so the Head of Safeguarding will ensure that there are established clear lines of accountability and case management and supervision to support staff with this process.

The Head of Safeguarding will ensure that the annual safeguarding audit process is effectively carried out and report any inadequacies to the Regional Director (Pastoral), Safeguarding Link Trustee, Regional Director, Executive Principal, DSLs and Safeguarding Link Governor. This will also form part of the report to inform the Trust Board.

4.4. Principal /Head of School and Executive Principal

The Head of School is responsible for the implementation of this policy, including:

- ensuring that the policies and procedures adopted by the Ark Schools Board and Local Governing Body, associated with protecting children are fully implemented, understood and followed by all staff and adhered to at all times.
- ensuring that staff are informed of De Lacy Primary School systems which support safeguarding, including this policy, as part of their induction.
- ensuring that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- ensuring that the DSLs and DDSs are properly supported in their role with adequate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent.
- communicating this policy to parents/carers when their child joins the school and via the school's website.
- Undertaking every two years their local authority training on 'Managing allegations and LADO processes'.
- ensure that children are taught about safeguarding, including online safety and resilience, as part of providing a broad and balanced curriculum. The De Lacy Primary School RSHE policy is available on the school website.
- ensuring that all staff undertake appropriate safeguarding and child protection training and the updating of content of the training regularly.
- acting as the 'case manager' in the event of an allegation made against an adult, (refer to Ark procedure for managing safeguarding concerns and allegations against staff, supply staff, trainee teachers, volunteers and non-Ark staff including contractors).
- making decisions regarding all low-level concerns,
- ensuring the relevant staffing ratios are met where applicable (Early Years and KS1 classes).
- making sure each child in the Early Years Foundation Stage is assigned a key person.
- making sure children in Early Years Foundation Stage have access to a trained DSL and all staff are pediatric first aid trained.
- appointing a Designated Lead for online safety with appropriate skills, interest and expertise regarding online safety and curriculum.
- ensuring their school maintains up to date records of all safeguarding concerns, using CPOMs as their sole recording tool for pupil safeguarding and child protection.

- ensuring school maintains accurate log of the use of reasonable force on CPOMS and using Every for incidents and accidents and Every system for fire drills, emergency response, evacuation and lockdown logging.
- ensuring allegations against staff including low level concerns and LADO referrals are recorded on Ark mandated logging system, Sign in Central Record (SICR).
- ensure their school maintains secure monitoring and filtering solutions for its school's devices that can alert the DSLs as soon as a problem emerges.

Where alternative provision is in place, the Head of School is responsible for ensuring school has obtained letters of assurance from that provider to confirm appropriate safeguarding checks have been carried out on individuals working in the provision, i.e. those checks that the school would otherwise perform in respect of its own staff and recorded on SICR.

Where pupils undertake work experience, the Head of School is responsible for ensuring that appropriate safeguarding procedures are in place in relation to supervising adults, in line with guidance in KCSIE 2026 paragraphs 398-402.

The Head of School/DSL is responsible for communicating this policy during induction to new staff and to parents when a child join De Lacy Primary and via the school's website.

4.5. Local Governing Body (LGB) / SPRB

The LGB / SPRB, have read and will follow KCSIE 2026 and will provide independent monitoring and review to their school.

The LGB / SPRB performs a vital role in monitoring compliance and challenging the school to ensure that best practice is followed. Therefore, all SPRB members must recognise their safeguarding duties towards children in their school. SPRB members are required to sign in acknowledgement of this responsibility upon joining their SPRB and this is to be reviewed annually.

The SPRB has nominated a member for safeguarding named on the contacts page of this policy. The nominated safeguarding link member will undertake independent monitoring and review of school level delivery in safeguarding by having termly meetings with the DSL, being part of the school safeguarding audit process, and support the presentation of the audit and reports to the SPRB.

4.6. Members of Staff

All members of staff have a responsibility to:

- provide a safe environment in which children can learn
- act as professional role models at all times, both within and outside of school, in line with the staff code of conduct
- report all concerns for a pupil's welfare and safety to the DSL or DDSL and log on CPOMS
- maintain an attitude of **'it could happen here'** where safeguarding is concerned and to always act in the best interests of the child
- understand De Lacy Primary School's systems which support safeguarding, including this child protection and safeguarding policy, the role and identity of the designated safeguarding lead (DSL)

and Deputy DSLs, the Behaviour policy, the Online safety policy, and the safeguarding response to children who go missing from education.

- record promptly any safeguarding concern, online violation, or reasonable force incident on CPOMS or a 'cause for concern form' for volunteers, external visitors, non-Ark staff.
- knows the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, online risks, radicalisation and serious violence (including that linked to county lines)
- know what to do if a child tells them he/she or that another peer or sibling is being abused or neglected.
- maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate.
- never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child.

If outside of school hours staff have concerns about a child being harmed or at risk of harm or any other child safety concerns (as opposed to a child being in immediate danger or harm) the NSPCC has a dedicated helpline you can contact: 0800 800 5000 or you can contact the charity at: help@NSPCC.org.uk or call 101 for non-emergency concerns.

If a child is in **immediate danger**, call the police on 999 straight away.

4.7. Multi agency safeguarding arrangements

De Lacy Primary School adopts a child centre and coordinated approach. Early help will be provided as soon as a need is identified. The school works in partnership with local safeguarding partners and agencies, ensuring timely referrals, information sharing and escalation where appropriate, in accordance with Working Together to Safeguard Children 2026. All staff will seek to identify children and families who may benefit from support from external professionals, engaging in discussions and obtaining consent when this is in the child's best interests.

Schools are not the investigating agency when there are child protection concerns, and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise that a crucial part of this may be in supporting the child while these take place.

De Lacy Primary School will follow any amendment made to the local multi-agency safeguarding arrangements under the Local Authority Safeguarding Partnership system. The DSL will ensure the changes are updated to staff to reflect what's new and staff should understand their roles and responsibilities under the new system.

De Lacy Primary School recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Family Support Teams around the Child / Family.

The school leadership team and DSL will work to establish strong and collaborative relationships with relevant professionals in other agencies.

5. Procedures

5.1. Indicators of abuse, neglect and exploitation

Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including sexual, physical, and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should **put the needs of children first** when determining what action to take. It is important to know the signs of abuse and to be alert to the need to consult further and to act if abuse is suspected or taking place.

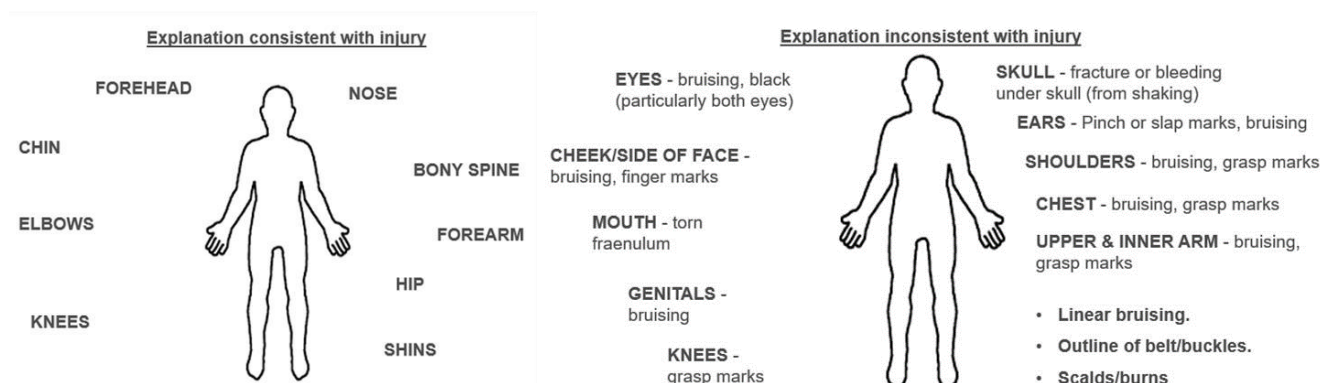
All staff in school should be aware of the definitions, signs and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Physical Abuse

Hitting, Shaking, Throwing, Poisoning, Burning or Scalding, Drowning, Suffocating, Inducing Illness, or otherwise causing physical harm to a child.

Physical Symptoms	Behavioural Indicators
Scratches/Bite Marks Bruising Burns/Scalds/Abrasions Cuts/Marks/Welts Untreated illnesses/injuries Inconsistent injuries	Self-destruction Improbable excuses Runaway Aggression/ withdrawal Fear of home Reluctance around physical contact Inappropriate clothes for the weather Fear of being watched



Emotional Abuse

May involve conveying to children that they are worthless, unloved, inadequate, or valued insofar as they meet the needs of others.

Physical Symptoms	Behavioural Indicators
Delays in physical, mental and emotional development Poor academic performance Speech disorders, particularly sudden disorders or changes.	Acceptance of punishment which appears excessive Over-reaction to mistakes Continual self-deprecation (I'm stupid, ugly, worthless etc.) Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking) Self-mutilation Suicide attempts Drug/solvent abuse Running away Compulsive stealing, scavenging Poor trust in significant adults Regressive behaviour – e.g., wetting Eating disorders Destructive tendencies Arriving early at school, leaving late or vice versa.

Sexual Abuse

May involve forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

Physical Symptoms	Behavioural Indicators
Sore/itching/bleeding in genital areas Torn/stained/bloody underclothes Chronic ailments – stomach pains and headaches Difficulty in walking or sitting Frequent urinary or yeast infections STI or STD Unexplained pregnancy Bruises inner thighs/buttocks Anorexic/Bulimic	Depression/suicide Sexualised actions/behaviour Sexually explicit language Low self-esteem Nightmares Fear of dark Outbursts of anger or hysteria Overly protective of siblings Association with older people Increased phone activity

Neglect

May involve failure to;

- Provide adequate food, clothing and shelter
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- Respond to a child's basic emotional needs.

Physical Symptoms	Behavioural Indicators
Constant hunger	Tiredness
Poor state of hygiene or clothing	Lack of social relationships Compulsive
Untreated Medical issues	stealing/begging/scavenging
Emaciation or distended stomach	Frequent absence or lateness
Tiredness	Low self-esteem
Exposed to danger, lack of supervision	Lack of focus and ability to concentrate

Further details of the signs and indicators of harm and abuse are included in the Appendix D below.

All members of staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label; in most cases multiple issues will overlap with one another.

Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. For example, children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger. An adult or adults, or another child or children may abuse them. Their peers, family members, by unknown, or in some cases unidentifiable individuals, may abuse children via the internet. In the case of honour-based abuse, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child may often experience more than one type of abuse, as well as other difficulties in their lives.

Abuse and neglect can happen over a period but can also be a one-off event. This can have major long-term impacts on all aspects of a child's health, development and well-being.

Harm can also include ill treatment that is not physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, the school can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

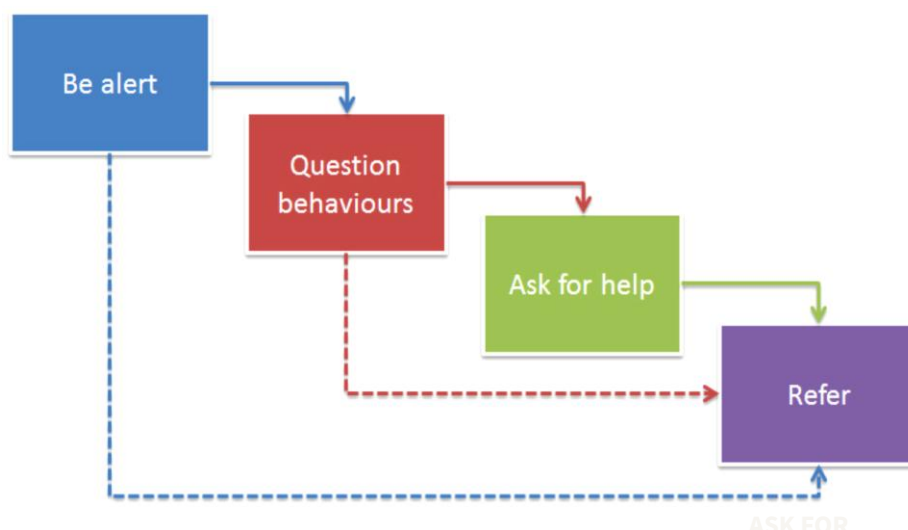
De Lacy Primary School recognises that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the DSL.

De Lacy Primary School staff recognise that knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school or persistent absence or unknown leavers can be an indicator of abuse and neglect and may raise concerns about other safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay.

5.2. Disclosures and concerns

'What to do if you are worried about a child being abused' (DfE 2015) p.12 (s.24) identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All members of staff are expected to be aware of and follow this approach.



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer to children's services and/or the police **immediately**, if a child is suffering or likely to suffer from harm, or is in immediate danger.

Anyone can make a referral e.g. GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council> **If you do make a referral directly to an external agency please inform the DSL and log appropriately.**

It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.

- To help with this decision s/he may choose to consult with the Local Authority multi agency safeguarding hub (MASH) / social care duty team/ Family Support team / police.
- Advice may also be sought from Ark Head of Safeguarding.
- Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.

When to call the police (NPCC)

De Lacy Primary School follows the advice ['When to call the police' guidance for schools](#) which covers incidents on school and off premises (including online) where pupils have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police and aims to support schools to make defensible decisions when considering whether to involve the police.

This advice covers but not limited to, the following situations and allegations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment (on and offline)
- Threatening Behaviour (on and offline)
- Sexual offences (both on and offline)
- Theft
- Weapons (serious violence)
- Unreported missing episodes

In all but the most exceptional circumstances, parents will be informed of any concerns about a child or young person at the earliest opportunity. Where a referral to the Local Authority Children's Social Care team is required, parents will be notified and consent sought, unless there is a justifiable reason not to do so or it is deemed that by doing so would place the child at further risk of harm. In time-sensitive situations, an inability to contact parents will not prevent the school from making a referral.

5.3. Responding to disclosures

- **Listen** – non-judgementally.
- If appropriate, ask open questions to clarify, but do not investigate. (e.g. “Who caused that mark?” Not, “Did your dad hit you?”)
- **Do not promise confidentiality** – assure him/her that you will try to help but you will have to tell other people to do this. State who this will be (DSL)
- **Reassure** the pupil, tell them it is not their fault, and communicate to them that they have a right to be safe and protected.
- **Refer** - Inform the designated member of staff about your concerns immediately (see DSL)

- **Record** your concerns on the electronic safeguarding software CPOMs which you can access from a desktop shortcut, via the school's website, or via SharePoint.
- **Seek appropriate support** for yourself. Speak with the DSL/DDSL in the first instance.

Recording Concerns

- Record the conversation/concern onto CPOMs on the same day.
- Record time, day, date, location of conversation and who was present.
- What the child said – **using the child's words**. Include any questions you may have asked. Detail is key.
- Include full names of child/ren and full names and job roles of staff in all recordings. No initials should be used.
- Make a note of any marks/bruises using the Body Map on CPOMS. This includes placement, size, colour (e.g. "fingerprint bruise on right arm, above the elbow, around the size of a 2p, yellowing in colour". Not, "small bruise on right arm).
- Avoid recording any judgments or opinions. **Remain factual**
- Be professional. Do not discuss the matter with others or where you can be overheard.
- Remember that Child Protection and Safeguarding information is only shared on a need-to-know basis.
- **Key Points:** if a child discloses abuse, it may be the beginning of a legal process and staff could be called to give evidence in court. Staff must ensure the incident log is accurate and professional and that it is not recorded on behalf of anyone else.
- Also be aware that proceedings against a perpetrator can be seriously affected by a suggestion that the child has been led by another person and includes your opinion on the disclosure.

5.4. Early Help and Targeted Family Help

De Lacy Primary School adopts a child-centred and coordinated approach to safeguarding. Early help will be provided as soon as a need emerges, in line with the principles of Working Together to Safeguard Children. The school will work in partnership with local safeguarding partners and other agencies to ensure timely referrals, effective information sharing and appropriate escalation of concerns.

All staff understand the importance of early help and are familiar with the school's approach to identifying and responding to emerging needs. Staff are expected to recognise indicators of concern, share information appropriately, and work closely with the DSL to ensure that children and families receive the right support at the right time.

This includes contributing to early identification and assessment processes, working collaboratively with other professionals, and, where appropriate, supporting or acting as a lead practitioner to help coordinate support. Indicators that a child may benefit from early help may include, for example, patterns of escalating behaviour, increased absence, or repeated suspensions.

Where early help is identified as appropriate, the DSL will support staff to engage with relevant services and to initiate a multi-agency response, including completing the Local Authority's Early Help or Targeted Family Help referral processes where required.

All early help interventions will be monitored and reviewed regularly by the DSL to ensure they are improving outcomes for the child. Where a child's needs are not being met, or concerns escalate, the DSL will consider whether a referral to Children's Social Care is required, in line with local threshold guidance and multi-agency safeguarding arrangements.

5.5. Behaviour and restrictive intervention

Any use of restrictive intervention must be reasonable, proportionate and lawful, used only where necessary to prevent harm. De Lacy Primary School will prioritise de-escalation and preventative strategies. All incidents must be recorded on CPOMS and reviewed to identify patterns. Particular consideration must be given to pupils with SEND or experience of trauma. Practice must align with DfE Restrictive Interventions Guidance (April 2026).

Staff should be aware of the guidance on reasonable force available in [Use of reasonable force and other restrictive interventions guidance](#) and physical interventions must be in line with the behaviour policy and procedure in which appropriate training is provided.

Reasonable force should only be used to prevent or stop;

- causing injury to themselves or others
- committing a criminal offence
- damaging property
- causing disorder among pupils at the school, whether during a teaching session or otherwise

5.6. Suspension and permanent exclusion

Safeguarding considerations must underpin all decisions relating to suspension and permanent exclusion. Schools must consider whether behaviour is linked to unmet safeguarding needs, SEND or contextual vulnerabilities. The DSL should be consulted. Reintegration planning must include appropriate safeguarding support. Decisions must align with DfE Suspension and Permanent Exclusion Guidance 2026.

5.7. Child on child incidents

At De Lacy Primary School all staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online.

At De Lacy Primary School it is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should be clear as to the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. At De Lacy Primary School we will support the victims of child-on-child abuse.

All staff should understand that even if there are no reports in their school does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to their DSL or DDSL.

All forms of child-on-child abuse are taken seriously and will never be dismissed as banter, part of growing up or 'just having a joke'. It is vital that all staff recognise and challenge inappropriate peer behaviours, including those outlined below, which are abusive in nature. Left unaddressed, such behaviours can foster a culture of acceptability, create an unsafe environment for children, and in the most serious cases, normalise abuse to the extent that children may not recognise it as harmful or feel confident to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory behaviour including racism, faith-targeted abuse and other prejudice-based incidents);
- abuse in intimate personal relationships between peers (sometimes referred to as teenage relationship abuse), including controlling or coercive behaviour;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, including through coercion or exploitation (e.g. forcing someone to strip, touch themselves sexually, or engage in sexual activity with others);
- the consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- upskirting, which involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause humiliation, distress or alarm;
- initiation or hazing-type violence and rituals (which may include activities involving harassment, abuse or humiliation as a way of initiating a person into a group and may also include an online element).

Further information about child-on-child abuse including definitions and indicators is included in Keeping Children Safe in Education 2026.

5.8. Sexual violence and sexual harassment between children

De Lacy Primary School recognises that the DfE's standalone guidance on sexual violence and sexual harassment has been fully incorporated into Keeping Children Safe in Education 2026, Part 5: Child-on-child sexual violence and sexual harassment.

At De Lacy Primary School, all staff understand that sexual harassment and sexual violence:

- **can happen here;**

- is never acceptable and a zero-tolerance approach is applied, recognising that failure to challenge such behaviour can lead to a culture of unacceptable conduct and, in the most serious cases, the normalisation of abuse;
- may be occurring even where there are no reports, and that absence of disclosure does not mean absence of harm;
- All staff receive training to ensure they understand how to respond appropriately to reports of sexual violence and sexual harassment, including the importance of reassurance, confidentiality, and taking all concerns seriously.
- will never be dismissed as “banter”, “part of growing up” or “boys being boys”;
- must always be challenged by staff, including harmful physical behaviours (which may be criminal in nature), such as grabbing bottoms, breasts or genitalia, pulling down trousers, flicking bras or lifting skirts — recognising that failing to address such behaviours risks normalising them;
- can be perpetrated by children towards other children and, in some cases, towards adults;
- disproportionately affect certain groups, including children with SEND;
- can have a greater impact on some groups, with evidence indicating that girls and LGBTQ+ children are at increased risk.

De Lacy Primary School staff are aware of Harmful Sexual Behaviour (HSB) and understand that:

- HSB can occur both online and face-to-face, and may take place simultaneously across both contexts;
- the age, developmental stage, and needs of the children involved are critical factors when considering the nature of the behaviour and the appropriate response;
- the DSL and deputies maintain a secure understanding of HSB, supported through appropriate safeguarding training;
- children who display HSB may have experienced abuse, trauma or adverse experiences themselves, and therefore require a balanced, child-centred response and access to appropriate support.

In responding to HSB, the DSL will:

- work with local authority children’s social care, the police and other relevant partners to understand the local approach to sexual violence and sexual harassment, ensuring that this informs the school’s policies and practice;
- ensure that all interventions are proportionate, appropriate and regularly reviewed, in line with the needs, age and risks identified.
- where there is an indication that a potential criminal offence may have been committed, the Academy will take appropriate action, which may include reporting the matter to the police and making relevant referrals to ensure that timely and appropriate support is secured for all children involved, including both victims and alleged perpetrators.

- Consider the need for community-based early help intervention, targeted family help or children's social care referrals.

Sanctions and the alleged perpetrator(s)

The De Lacy Primary School DSL should take the lead role, including:

- The conclusion that another body investigating or having investigated an incident does not (in itself) prevent the school from coming to their own conclusion about what happened and imposing an appropriate sanction in line with the Behaviour Policy.
- Consideration on a case-by-case basis
- The DSL should consider whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution; liaise with the police and/or LA children's social care to determine this
 - There are circumstances that make it unreasonable or irrational for the school to reach their own conclusion about what happened
 - Disciplinary action can and should be taken while still providing necessary support and safeguarding

Working with parents and carers

The De Lacy Primary School DSL will consider whether:

- (in most cases) to engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of sexual violence (this might not be necessary in relation to sexual harassment but decide it on a case-by-case basis).
- the exception is if there is reason to believe informing a parent or carer will put the child at additional risk or compromise a criminal/legal process.
- should think carefully about what information you provide about the other child involved, and when. Make sure you work with relevant agencies to ensure your approach to information sharing is consistent particularly when a criminal/legal process is taking place.
- consideration is taken of necessary support for siblings following incidents.
- It is good practice where appropriate to:
 - Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress.
 - Meet with the alleged perpetrator's parents or carers to discuss what is being put in place and the reason behind the decision, e.g. moving them out of classes with the victim.
- the DSL would attend these meetings, decide what other agencies should attend on a case-by-case basis.

Safeguarding other children

The De Lacy Primary School DSL will:

- support children (and adult pupils) who have witnessed sexual violence, especially rape and assault by penetration.
- Implement timely and considered risk assessments, working collaboratively to with relevant agencies e.g., CAMHS, police, children's social care.
- do all they can to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed.
- acknowledge social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
- consider school travel as part of your risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s).
- Identify more unstructured periods of the school day are potentially vulnerable spaces for a victim or alleged perpetrator(s)
- keep policies, processes and curriculum constantly under review to protect all children.
- recognise reports of sexual violence and/or harassment may:
 - Point to environmental/cultural/systematic problems that could be addressed by updating policies, processes and the wider curriculum.
 - Reflect wider issues in the media and online
 - Reflect wider issues in the local area

Full advice and guidance can be found in Keeping Children Safe in Education 2026, Part 5.

5.9. Consensual and non-consensual sharing of nudes and semi-nude images

In cases involving the sharing of nude and semi-nude images and/or videos, De Lacy Primary School follows the Department for Education guidance: [Sharing nude and semi-nudes: advice for education settings working with children and young people \(Dec 2020, updated March 2024\)](#), Ark (Pontefract Region) Behaviour Policy and De Lacy Primary Online Safety Policy

This guidance uses the term sharing nudes and semi-nudes to describe the sending or posting of nude or semi-nude images, videos or live streams by children under the age of eighteen. This may take place online via social media, gaming platforms, chat applications or forums, and may also occur through direct device sharing, including wearables and the use of offline services such as AirDrop.

This behaviour is considered a form of child-on-child abuse.

All incidents are responded to in line with safeguarding procedures, ensuring a proportionate, child-centred response that recognises both the potential harm, the need for support and legal frameworks. The school will consider whether incidents involve coercion, exploitation, or wider safeguarding concerns, and will make referrals to external agencies where appropriate.

All incidents must be reported to the DSL, who will undertake a risk assessment and determine the appropriate course of action, including whether the threshold for police involvement is met.

Staff will not view, copy, print, share or delete images unless there is an absolute immediate safeguarding reason to do so. Any such decision to do so will only take place with prior consent from the DSL or Principal and recorded on CPOMS.

The school recognises that children involved in these incidents may be victims of abuse, exploitation or coercion and will ensure they are supported appropriately and not blamed.

Up-skirting

De Lacy Primary School recognises upskirting as a criminal offence under the Voyeurism (Offences) Act 2019. This involves taking a photograph or recording beneath a person's clothing without their consent, with the intention of viewing their genitals or buttocks, either for sexual gratification or to cause humiliation, distress or alarm.

This behaviour is considered a form of child-on-child abuse.

The school will take all incidents seriously and will not tolerate such behaviour being dismissed as banter or part of growing up. A victim-centred approach will be adopted at all times, ensuring that children affected are listened to, supported and safeguarded appropriately.

All incidents must be reported to the DSL, who will assess the situation, undertake a risk assessment and determine the appropriate course of action, including whether the threshold for police involvement or other external agency referral is met.

The school will consider whether incidents involve coercion, exploitation or wider safeguarding concerns and will make referrals to external agencies where appropriate.

Further information about peer-on-peer abuse and safeguarding procedures is set out in Keeping Children Safe in Education (2026) and is reflected within the school's Behaviour Policy.

5.10. Radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is known as become known as the 'Prevent Duty'. De Lacy Primary School recognises that safeguarding children from radicalisation is part of its wider safeguarding responsibilities.

Where staff are concerned that a child or young person may be developing extremist views or is at risk of becoming radicalised, they must report this concern to the DSL without delay.

Staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. This may include indicators of vulnerability to radicalisation. Staff should use their professional judgement in identifying children who might be at risk and act proportionately, following safeguarding procedures.

The DSL has received appropriate training in relation to the Prevent Duty and tackling extremism and will support staff with any concerns. The DSL will undertake a risk assessment, consider the level of need and risk, and determine the appropriate course of action, including whether a referral should be made to Channel. This could include [Channel & Prevent Multi Agency Panel guidance](#), or other relevant agencies.

Channel is a voluntary, multi-agency program which supports individuals who are at risk of being drawn into terrorism. The DSL will follow Channel and Prevent Multi-Agency Panel (PMAP) guidance when considering referrals. The school will work in partnership with external agencies where appropriate and ensure that any actions taken are child-centred, proportionate and in line with statutory guidance.

The Department for Education also provides a dedicated telephone helpline (020 7340 7264) that staff and governors can contact to raise concerns about extremism relating to a pupil. In an emergency, staff should call 999 or the confidential Anti-Terrorist Hotline on 0800 789 321.

De Lacy Primary School uses the curriculum to build pupils' resilience to radicalisation by promoting critical thinking, digital literacy and the ability to challenge extremist narratives. The school is committed to providing a broad and balanced curriculum which prepares pupils for life in modern Britain. Teaching the Academy's core values alongside the fundamental British Values supports quality teaching and learning and makes a positive contribution to the development of a fair, just and democratic society.

Further information about the Prevent Duty is set out in Keeping Children Safe in Education (2026), including Annex A.

5.11. Online safety

De Lacy Primary School recognises that the use of technology, including artificial intelligence (AI), presents both opportunities and risks to children and adults, both within and beyond the school environment. Online safety is a critical component of safeguarding and will be approached in a whole-school, child-centred and preventative manner, in line with Keeping Children Safe in Education (2026) and the Ark Online Safety Policy.

The school has developed a comprehensive approach to online safety through education, supervision, filtering and monitoring, and clear safeguarding procedures. This approach is set out in detail within the De Lacy Primary School Online Safety Policy, which outlines expectations, roles, responsibilities and systems to safeguard all members of the school community in their use of digital technologies, including AI.

De Lacy Primary School recognises that the breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with others
- **Conduct:** online behaviour which increases the likelihood of harm or causes harm to others
- **Commerce:** risks such as fraud, scams, data breaches and malicious activity.

Adults (including visitors) must not use personal devices (including wearables e.g., glasses, EarPods or watches) to take images, recordings of children or staff or to communicate with children or families. Adults must not communicate with children, unless explicitly authorised and in line with safeguarding procedures.

Staff Training

De Lacy Primary School will ensure that:

- Staff completes the Ark Online Safety training and maintains up to date knowledge of emerging risks, including AI-related harm
- All staff receive safeguarding and child protection training (including online safety) at induction and at least annually
- Staff receive regular updates (e.g. briefings, bulletins or meetings) to ensure they have the knowledge and skills to safeguard children effectively online
- All staff understand that online safety is a safeguarding responsibility and that concerns must be reported in line with safeguarding procedures.

Wearable technology and smart devices

De Lacy Primary School recognises that advances in technology mean that some children, staff and visitors may use wearable devices capable of recording, storing or transmitting audio, images, video, location or other data. These devices may include, but are not limited to, smart watches, smart glasses (e.g. Meta/Ray-Ban smart glasses), wireless earbuds (e.g. AirPods), smart pins, body-worn devices, fitness trackers and other wearable technology.

To safeguard children, protect privacy and maintain an appropriate learning environment, the school reserves the right to restrict, prohibit or place conditions on the use of wearable technology on school premises, during educational visits and while participating in school activities. The use of any device capable of recording, livestreaming, photographing, monitoring or transmitting information must comply with the school's safeguarding, behaviour, online safety, mobile phone, data protection and acceptable use policies.

Staff, children and visitors must not use wearable devices to record, photograph, monitor or listen to others without appropriate authorisation and consent. Any concerns regarding the misuse of wearable technology, including unauthorised recording, online harm, bullying, harassment, exploitation, privacy breaches or the sharing of images or information, must be reported immediately to the DSL in accordance with our safeguarding procedures.

To maintain a safe, focused and disruption-free learning environment, students are not permitted to use mobile phones on the school site during the school day. Where students are authorised to bring a mobile phone into school, it must be switched off and stored securely in accordance with the school's agreed procedures.

Smart wearable devices with the capability to record, photograph, film, access the internet, send messages or make calls are not permitted for student use in school. Any unauthorised use of such devices may result in the device being confiscated and further action being taken in line with the school's Behaviour and Relationships Policy.

All staff are required to read, understand and sign the Trust's Acceptable Use Agreement and must ensure that their use of technology and personal devices complies with Trust safeguarding, professional conduct and information security requirements.

Visitors, contractors and volunteers are required to comply with the school's expectations regarding the use of mobile phones and smart devices. Acceptance of these requirements forms part of the visitor sign-in process, and visitors must follow all safeguarding and confidentiality expectations whilst on site.

Any misuse of mobile phones, smart devices or wearable technology that raises safeguarding concerns will be managed in accordance with the Trust's Safeguarding and Child Protection Policy and the school's Behaviour and Relationships Policy.

5.12. Smartphone free school

De Lacy Primary School supports the statutory expectation that children are smartphone-free during the school day. This approach aims to reduce exposure to harmful online content, support positive behaviour and wellbeing, and promote a focused learning environment.

The school recognises that some children may access the internet through personal devices and mobile data in specific circumstances. Where permitted, expectations around safe use are clearly outlined (e.g., during a school trip). Children sign an Acceptable Use Agreement, and any breaches are managed in line with the Behaviour Policy.

5.13. Filtering and monitoring

De Lacy Primary School manages online safety risks through robust filtering and monitoring systems in line with DfE standards and Ark policy. Web filtering is provided through SWGfL, and monitoring is supported through Senso, enabling real-time oversight and safeguarding alert systems across school devices.

The DSL maintains oversight of filtering and monitoring systems and works with IT to ensure systems are effective, proportionate and regularly reviewed. Safeguarding concerns identified through monitoring are responded to in line with safeguarding procedures.

For further information on the use of mobile phones, smart technology, AI technology, cameras and sharing of images please see Ark AI and IT Acceptable Use Agreement.

De Lacy Primary School will ensure that:

- Filtering and monitoring systems are effective and proportionate, avoiding unnecessary over-blocking
- All concerns or breaches identified are acted upon promptly with appropriate safeguarding response and in line with relevant policies and procedures (e.g. staff code of conduct and Behaviour Policy)
- Systems are reviewed regularly to respond to emerging risks, including new technologies and AI platforms

5.14. Curriculum and staying safe

De Lacy Primary School recognises its essential role in helping children understand what safe and appropriate behaviour is, both online and offline and embedded across the curriculum. Children are taught how to identify risk and seek support. Safeguarding education includes (but is not limited to):

online safety, bullying (including cyberbullying), child-on-child abuse, sexual harassment and violence, exploitation, radicalisation and consent.

Children are taught:

- a. Self-image and identity
- b. Online relationships
- c. Online reputation
- d. Online bullying
- e. Managing online information
- f. Health, well-being and lifestyle
- g. Privacy and security
- h. Copyright and ownership

Staff reinforce online safety messages with parents and carers and provide guidance to support safe use of technology at home. Further information can be found in our separate Online Safety Policy 2026.

Any concerns arising through teaching or child disclosures must be reported to the DSL and recorded in line with safeguarding procedures.

Further information in relation to the school's approach to Relationships, Sex and health education can be found in the following policy which is available on the school website.

5.15. Out of Hours monitoring and support

De Lacy Primary School recognises that safeguarding risks continue outside of school hours. Monitoring systems may identify safeguarding concerns during weekdays outside normal hours. The monitoring and filtering software SWGFL/SENSO will alert Principals of urgent or critical safeguarding concerns. SENSO/SWGfL emergency protocol will also provide a notification signposting pupil(s) to access external support (NSPCC, Police, ambulance service, Local Authority numbers/links) if they are unsafe or being abused.

Children, parent's and the community are able to seek support or refer concerns out of hours in a number of different ways;

- **Wakefield Social Care Direct** - All members of the public can access Social Care Support through {insert Local authority support and advice line} Outside of these hours LA advice can be contacted through the Emergency Duty Team on 0345 850 3503. Their website can be visited here: <https://www.wakefield.gov.uk/children-and-families/safeguarding>

6. Staff training

All staff members and new governors **must** receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. This includes all Ark central employees who are normally based at De Lacy Primary School. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, ebulletins and safeguarding briefings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively

All members of staff will be provided with a copy of Part One of Keeping Children Safe in Education (2026), which sets out statutory safeguarding information for staff. DSL's and school leaders will read the entire document. All members of staff who work directly with children will access Part One and confirm that they have read and understood it. This confirmation is recorded and held on the school's Single Central Record platform (SICR).

In addition, all staff working with children in Early Years will be provided with and must read, Section 3: Safeguarding and Welfare Requirements, of the Early Years Foundation Stage (EYFS) Statutory Framework.

Staff and governors are also required to complete the Ark online KCSIE Module to ensure understanding of safeguarding expectations.

The key training elements are:

DSLs – Attend Local Authority safeguarding training at least every two years. Receive regular updates and refresh their knowledge and skills at least annually, in line with KCSIE expectations.

All other staff – (including teaching, support staff and volunteers) Receive safeguarding and child protection training at induction and at least annually thereafter. Are made aware of a range of safeguarding issues, including those that may present online. Understand that behaviours such as substance or alcohol misuse, persistent absence and child-on-child abuse (including bullying and the sharing of nude and semi-nude images) can place children at risk. Receive training in school safeguarding procedures, safe working practice and external reporting mechanisms

All members of staff will be:

- made aware of the school's expectations regarding safe and professional conduct through the Staff Code of Conduct and AI and IT Acceptable Use Agreement and policy, as part of the induction process.
- Provided with regular safeguarding and child protection updates, at least annually, to ensure they have the relevant knowledge and skills to safeguard children effectively.

All staff members will also receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:

- **Recognise** potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with the school policies
- **Refer** concerns to the DSL and be able to seek support external to the school if required

Safer Recruitment - training is provided to all staff involved in recruitment processes.

De Lacy Primary School recognises the expertise developed by staff through safeguarding training and day-to-day management of safeguarding concerns.

All members of the governing body receive appropriate safeguarding training to support their strategic responsibilities. This training is regularly updated to ensure governors are assured that safeguarding systems, including staff training, remain effective.

7. Supporting staff

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

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- Staff can create an environment where members of staff feel able to raise concerns and feel supported in their safeguarding role
- All staff have regular reviews of their own practice to ensure they improve over time.
- New to role DSL's have access to KIT with Head of Safeguarding or where additional support is required.
- Supervision support is available to DSLs
- Staff have access to Ark Employee Programme

8. Staff conduct

All De Lacy Primary School members of staff are required to work within clear guidelines on Safe Working Practice outlined within our staff behaviour policy (**also called the Staff Code of Conduct**) which also includes information on:

- Low-level concerns
- Allegations against staff (including transferrable risk), and
- Whistleblowing

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

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.). Staff should familiarise themselves with advice and professional expectations outlined in Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings and the network policy AI and IT Acceptable Use Agreement.

9. Managing allegations

De Lacy Primary School recognises that it is possible for staff, supply staff, trainee teachers, volunteers and non-Ark staff (including contractors) to behave in a way that might cause harm to children, in or out of working hours and takes seriously any allegation received.

We understand that on occasions pupils may make allegations against an adult however, staff should also take care not to place themselves in a vulnerable position with a pupil where an allegation can be made.

De Lacy Primary School ensure that anything that constitutes an allegation or concern against an adult, will be dealt with under the specific '**Procedure for Managing safeguarding concerns and allegations made about staff, trainee teachers, supply teachers, volunteers and non-Ark staff including contractors**'. This additionally includes matters dealt with under Transferable Risk.

All allegations and concerns must be logged on the mandated SICR recording system by the Head of School under the applicable category

The guidance in KCSIE (Part Four) should be followed and read in conjunction with Ark **Procedure for Managing safeguarding concerns and allegations made about staff, trainee teachers, supply teachers, volunteers and non-Ark staff including contractors**', where it is alleged that any of the above roles working in the school or activity that provides education for children under 18 years of age, has:

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

The Local Authority Designated Officer (LADO) must be informed of all allegations that come to the school's attention that appear to meet the criteria to discuss the content of the allegation.

De Lacy Primary School also recognises that, at times, malicious allegations may be made against staff. In such cases, it is important to safeguard the member of staff and support their wellbeing, alongside investigating the reasons why the malicious allegation was made and supporting the child and family through the process of investigation and resolution, in line with KCSIE 2026 Part 4.

Any historic allegations regarding previous staff or pupils will be referred to the relevant agencies, including the police.

Low-level concerns

A low-level concern is one which does not meet the threshold as defined above, this does not mean that the concern is insignificant. No matter how small a staff member may perceive their concern if an adult working in or on behalf of the school has acted in a way which is:

- inconsistent with the school's behavioural standards as set out in the code of conduct, teachers standards, disciplinary policy and safeguarding and child protection policy, including inappropriate conduct outside of work
- does not meet the threshold or would not be considered serious enough to consider a referral to LADO.

De Lacy Primary School recognises that:

- Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure

- That this behaviour exists on a wide spectrum from thoughtless, context specific actions or that which is intended to enable abuse. It is crucial that all staff feel enabled to raise such concerns with the designated safeguarding lead or deputy to ensure that such concerns are recorded and dealt with promptly and appropriately
- Schools should follow Page 18 of **Ark Procedure for Managing safeguarding concerns and allegations made about staff, trainee teachers, supply teachers, volunteers and non-Ark staff including contractors** when it comes to sharing a low-level concern. The Head of School should be the ultimate decision-maker in respect of all low-level concerns
- If you're in any doubt as to whether a low-level concern meets the harm threshold, the Head of School must consult with the Executive Principal, the Ark Schools Head of Safeguarding and/or your local authority designated officer (LADO)

Low-level concerns should be recorded on the Network mandated approved logging system SICR, by the Head of School as either meeting threshold or not meeting threshold. This record must include:

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

Records must be kept confidential, held securely and comply with the Data Protection Act 2018 the UK General Data Protection Regulation, and 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.

Where a pattern of such behaviour is identified, De Lacy Primary School should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Transferable Risk

This is where the behaviour of a member of staff or volunteer outside of the workplace could have an impact on their suitability to work with children.

Examples of transferable risk may include but not limited to, the following:

- risk to children from behaviour outside work
- sexual or physical assaults on an adult.
- possession of weapon
- serious drug offences
- extremist behaviour / publicly expressing extremist views.

- risk from one employment to another (including volunteering)
- where someone's own child(ren) are subject to Child Protection investigations or safeguarding related plans.
- close association with someone in personal life who presents a risk of harm to a child.

Behaviour that may have happened outside of school or Ark network, that might make an individual unsuitable to work with children, is considered under the Ark Managing Allegations guidance and De Lacy Primary School Code of Conduct.

Duty to refer to the Disclosure and Barring Service

De Lacy Primary School recognises the duty laid out in KCSIE 2026 to refer to the Disclosure and Barring Service (DBS) in incidences where an allegation leads to the removal an individual from regulated activity (or would have removed an individual had they not left), if the school believes the individual has:

- engaged in relevant conduct in relation to children and/or adults,
- satisfied the harm test in relation to children and/or vulnerable adults; or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

De Lacy Primary School will ensure referrals are be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

Duty to consider referral to the Teaching Regulation Agency

De Lacy Primary School also recognises the duty to consider referring to the Teaching Regulation Agency (TRA) as set out in KCSIE 2026 page 107.

10. Whistleblowing

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

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

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and the senior leadership team will always take such concerns seriously.

All members of staff are made aware of the Academy's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child, young person or vulnerable adult at risk. The Ark Whistleblowing Policy should be used in conjunction with the 'Procedure for Managing safeguarding concerns and allegations made about staff, trainee teachers, supply teachers, volunteers and non-Ark staff including contractors.

The NSPCC runs a whistleblowing helpline on behalf of the government. Members of Staff can also access this helpline if they do not feel able to raise concerns regarding failures internally. Staff can call: **0800 028 0285** (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk.

11. Safer recruitment

De Lacy Primary School is committed to ensure that all steps are taken to only recruit staff and volunteers who are safe to work with our pupils and have their welfare and protection as the highest priority. This also includes staff not directly employed by the school but who are engaged to undertake work, including agency, contractor and third-party staff. Appropriate safeguarding checks will be undertaken for volunteers in accordance with KCSIE and where volunteers engage in regulated activity, an enhanced DBS check with barred list information will be obtained. For schools operating under the Early Years Foundation Stage (EYFS) framework, volunteers must not begin work within EYFS settings until the school has received the volunteer's enhanced DBS certificate, including barred list information.

Safer recruitment is a set of practices and a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm. Our Academy is responsible for implementing robust safer recruitment practices when recruiting, particularly during the advertising, shortlisting, interviewing and assessment process. Safer recruitment should be a continuing process of improvement for ourselves and any club, business or organisation whose work or services involve contact with our pupils.

At De Lacy Primary School the use of the Ark Recruitment & Appointment policy (Appendix B of this policy) is to ensure that Ark Schools employs appropriately skilled staff, assist Ark Schools to deter, identify and reject people who are unsuitable to work with children, help promote equality of opportunity and ensure that Ark Schools meets its statutory obligations.

More information on Safer Recruitment can also be found in KCSIE 2026 Part Three, and in relation to the network approach can be found in The Ark Safer Recruitment process, included in the Appendix B below.

12. Additional vulnerabilities

De Lacy Primary School recognise that a key part of safeguarding is proactive, early intervention. To ensure that vulnerable pupils are identified and supported at the earliest opportunity, our staff pay particular attention to early risk factors, particularly those relating to behaviour, mental health and disengagement from education. It is important that all staff are aware of the link between behaviour, attendance, SEND and safeguarding issues and how they may indicate a child is at risk of harm. School staff must monitor and analyse behaviour and attendance data frequently to detect emerging patterns of behaviours or absence.

12.1 Behaviour

Staff should be aware of the school's procedures in place that monitor children's behaviour and wellbeing.

Staff should take a data informed approach to identifying key trends and patterns emerging throughout the year. Whole school and individual level interventions should be identified and actioned swiftly to ensure that risks are reduced. Behaviours linked to issues such as drug taking and or alcohol misuse,

deliberately missing education and sharing nudes and semi-nudes images and or videos can all be signs that children are at risk. Staff should also pay particular attention to less overt behaviour patterns, such as children who appear to be withdrawn or isolated. It is important for our DSL to be involved in discussions and reviews of the behaviour process and policy. At whole school level, DSLs play an important part in assisting in developing strategic, proactive work around behaviour issues such as bullying, harassment and contextual safeguarding risks. At an individual pupil level, DSLs can support with decisions about referrals and interventions and are well placed to be able to make links with current or historic safeguarding risk factors and the behaviour of the child.

De Lacy Primary School have their own rewards, praise and behaviour policy which sets out expectations for appropriate behaviour of staff and pupils. This includes clear guidance relating to anti-bullying and harassment, use of reasonable force, and risk assessments relating to harmful sexual behaviour.

12.2 Attendance and children missing education

De Lacy Primary School staff must be aware of all procedures that monitor children's attendance and absences, including unauthorised absences, authorised absences, punctuality to school, punctuality to lessons and on-site truancy. All tracking and monitoring of attendance must be completed in 'real time'. Reports of non-attendance, lateness or truancy should be communicated to parents and relevant external agencies as soon as possible. Reporting should not wait until the end of the school day.

All staff should be aware that children who are absent from education, going missing, particularly repeatedly, can act as a significant warning sign. Unexplained or persistent absence will be treated as a potential safeguarding concern. Children going missing may be an early indicator of a range of abuse, such as neglect, including sexual abuse, child criminal exploitation, mental health difficulties, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Children who are absent from education may be at a significant risk of:

- not meeting their academic potential and underachieving
- becoming NEET (not in employment, education or training) in later life
- being victims of harm, abuse or exploitation
- involvement in criminal or gang-related activity.

De Lacy Primary School staff recognise that there are a higher proportion of children recorded as missing education when there is a link to poverty, deprivation or involvement with social services.

All De Lacy Primary School staff should be taught how to take registers using the school's centralised system. Staff should also be clear about any timeframes for submission of AM/PM or lesson registers. Registers should be taken quickly and submitted via the central system to ensure that absences are flagged at the very earliest opportunity. The central system must be monitored at key points throughout the course of the day to ensure that anomalies are identified and missing pupils are located and accounted for. This should happen consistently throughout the course of the day, at each registration point.

Emerging patterns of non-attendance should be identified quickly and followed up using the school attendance and punctuality protocols. Joined up working between the DSL and Attendance Leads is crucial in identifying and investigating any safeguarding risk factors. There should be frequent communication between these colleagues throughout the course of each term. Communication should include summaries of concerns and any specific actions taken to address non-attendance and reduce

associated risks. It is vital that these concerns, discussions and actions are well documented, and that actions are reviewed at regular intervals as part of the triangulation process. The school will work with partners to identify and support children missing education

12.3 Mental Health

All staff at De Lacy Primary School should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other potentially traumatic adverse childhood experiences. De Lacy Primary School we implement a graduated approach to Mental Health and Wellbeing in line with DfE guidance.

KCSIE 2026 states that: 'Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation'.

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

Where children have suffered abuse, neglect, exploitation or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff understand how these experiences can affect children's mental health, behaviour, attendance and attainment."

At De Lacy Primary School, we recognise that all staff have a role to play in identifying early indicators of mental health needs and providing a supportive environment for children. The school can access a range of advice and support to help identify children who may need additional mental health support, including working with external agencies. Further information can be found in the DfE's 'Mental health and behaviour in schools' guidance and associated resources to support the promotion of positive mental health, wellbeing and resilience.

All staff at De Lacy Primary School are aware that mental health needs may be linked to safeguarding concerns and that children who are experiencing mental health difficulties may be more vulnerable to further harm.

Staff should also be aware that certain periods, such as examinations or transitions, may increase levels of stress and anxiety for some children, potentially impacting on their attendance, behaviour and engagement with learning.

Where staff have a concern about a child's mental health that may also be a safeguarding concern, immediate action should be taken in line with the school's safeguarding procedures, including reporting concerns to the DSL or deputy.

The DSL will ensure, through induction and regular training, that staff understand the processes for recognising, responding to, and escalating concerns about mental health. Where a member of staff has concerns about a child's mental health, they should speak to the DSL in the first instance.

Further information about mental health, including definitions and indicators, is included in KCSIE 2026 (including Annex B).

12.4 SEND

De Lacy Primary School acknowledges that children with special educational needs (SEN) and disabilities or certain health conditions can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs, which may make it difficult to tell others what is happening, may be abused more than their non-SEND peers, may find it difficult to express their views, needs and opinions, could be a PA pupil or a pupil whereby the parent elects to home educate.

De Lacy Primary School will ensure that children with SEND, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

Children and young people with special educational needs and disabilities 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.

It is important that SEND needs do not automatically indicate abuse or risk of abuse. However, it is important to ensure that relevant information is shared quickly so that professionals can build a comprehensive well-rounded view of the child's needs.

It is essential that the SENCO and DSL share information throughout the course of each term and work in partnership to quickly identify and action the most appropriate level of support for children at risk. This is key in ensuring that holistic support is in place for our vulnerable children, at the very earliest opportunity.

Further information in relation to the school's approach to SEND can be found in our full SEND policy.

12.5 LGBTQ+

At De Lacy Primary School we recognise that a child or young person who may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether or not) can be just as vulnerable as children who identify as LGBTQ+. Children may also be isolated at home or become homeless after coming out as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. At De Lacy Primary School, we endeavour to reduce the additional barriers faced for our pupils by having a safe space for them to speak to someone or identifying relevant members of staff to speak with.

12.6 Gender Identity

Children who are questioning their gender identity may be at increased risk of harm, bullying, emotional distress, exploitation or adverse mental health outcomes. These children may therefore require additional safeguarding consideration.

De Lacy Primary School will adopt a child-centred approach, recognising that each case is unique and must be considered individually. Support will be planned and delivered on a case-by-case basis, taking into account the child's age (displaying extra caution in primary settings), development, understanding and expressed wishes, alongside the views of parents or carers.

Parental involvement will be the default position. Parents or carers will be informed and involved in decision-making unless there is a clear and evidenced safeguarding risk to the child in doing so. Any decision not to involve parents will be made in conjunction with the DSL and will be clearly recorded on CPOMS, with advice sought from relevant agencies where appropriate.

The DSL must be involved in all cases where a child is questioning their gender identity or where support relating to gender identity is being considered. The DSL will ensure that:

- all decisions are risk-assessed, evidence-informed, and recorded;
- the school considers whether the child may be experiencing underlying vulnerabilities or safeguarding risks;
- appropriate multi-agency support is sought where needed.

Social Transitioning

De Lacy Primary School recognises that social transitioning (for example, changes to name, pronouns, uniform or presentation) is a significant step and will not be treated as a neutral act. Any consideration of social transition will be approached with caution, taking into account potential long-term implications, the child's age and understanding, and advice from relevant professionals. Decisions will be made in partnership with parents/carers (unless not appropriate for safeguarding reasons) and under the direction of the DSL.

In relation to single-sex spaces, including toilets, changing rooms and residential accommodation, the school will comply with its legal responsibilities under the Equality Act 2010, recognising that it is lawful to maintain separate single-sex spaces. The school will make reasonable, proportionate arrangements to ensure the safety, dignity and privacy of all pupils. This may include providing alternative or private facilities where appropriate.

12.7 Children with a social worker

At De Lacy Primary School we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

Virtual School Heads

Virtual school heads are based within the Local Authority and have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, Designated Teacher for Looked After Children and Previously Looked After Children, SENCOs, social workers, mental health leads and others.

12.8 Unexplainable and/or persistent absence from education

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

At De Lacy Primary School we monitor attendance, as well as persistent and severe absence carefully and address poor or irregular attendance without delay.

At De Lacy Primary School we follow the Ark school leavers management and statutory guidance and ensure our processes keep track of pupils leaving our school for any reason and offer better support management of any at risk cases.

At De Lacy Primary School when pupils leave, we make sure leavers are correctly processed through the MIS and visible on our systems and record the name of the pupil's new school and their expected start date.

We will always follow up with parents when pupils are not at school. This means we need to have at least two up to date contacts numbers for parents/carers. In some cases, this is not possible, so schools are encouraged to carry out a review of pupil contact information once a term (annually is mandatory) to capture additions and changes to contact details. 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 (2026) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded
5. Knowledge of local offer and the Team Around the School and Setting (TASS)

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

Further information about children who are absent from education including definitions and indicators is included in KCSIE 2026 paras. 213-217 and in our full Attendance Policy.

12.9 Domestic Abuse (DA)

De Lacy Primary School recognise that witnessing domestic abuse is child abuse and children are victims in their own right. As such, staff are expected to report concerns using the usual safeguarding procedures.

The statutory definition for Domestic Abuse can be found in the Domestic Abuse Act 2021 (updated June 2026).

The definition of Domestic Abuse applies to children who sees, hears, or experiences the effects of, domestic abuse and is related to or under parental responsibility of the person being abused or the perpetrator is also to be regarded as a victim of domestic abuse.

At De Lacy Primary School we recognise that:

- children who witness domestic abuse are also victims
- witnessing domestic abuse can have a lasting impact on children
- children can be victims, and perpetrators, in their own relationships too
- the abuse can be physical, sexual, financial, psychological or emotional
- extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships)
- Added to the definition of abuse that harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children

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.

At De Lacy Primary School we are part of Operation Encompass

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

Further information can also be found [here](#).

12.10 Safeguarding aged 18 and over

De Lacy Primary School recognises that safeguarding duties extend to all pupils on roll, including those aged 18 and over. While statutory guidance such as KCSIE 2026 primarily applies to children under 18, the academy remains committed to responding to any safeguarding concerns involving post-18 pupils with the same rigour and care who are on the school roll.

Key Principles:

- All safeguarding concerns involving pupils aged 18 and over will be responded to in line with this policy and De Lacy Primary School's safeguarding procedures.

- Staff must continue to report concerns via the DSL/CPOMs and follow the same escalation routes as outlined for children under 18.
- De Lacy Primary School will consider the safeguarding needs of these pupils under the framework of adult safeguarding where appropriate.

Relevant Legislation and Guidance:

- Care Act 2014
- Working Together to Safeguard Children 2026
- Education and Training (Welfare of Children) Act
- Data Protection Act 2018 and UK GDPR
- Keeping Children Safe in Education 2026

Transitional Safeguarding

De Lacy Primary School acknowledges the concept of transitional safeguarding, recognising that young people do not suddenly become 'safe' on their 18th birthday. De Lacy Primary School will work with adult services, where appropriate, to ensure continuity of care and protection for vulnerable young adults.

Where a safeguarding concern involves a pupil aged eighteen or over, the DSL will assess whether the concern meets the threshold for referral to adult safeguarding services under the Care Act 2014 and will liaise with the local authority accordingly.

13. Record-keeping

13.1 CPOMS

Staff will record all safeguarding concern, or physical restraint incident that they have about a child on CPOMs the safeguarding all-in-one online recording tool. The school also has a safeguarding incident/concern form for volunteers, supply teachers, extended staff or visitors who do not have a school email address account. All referrals must be passed without delay to the DSL.

Include full names of child/ren and full names and job roles of staff in all recordings. No initials should be used.

Records will be completed as soon as possible after the incident/event on the same day, using the child's words where necessary, and will be signed and dated and uploaded onto CPOMs.

All staff at De Lacy Primary School are trained on the use of CPOMs. It forms part of the induction process for staff as well as within the annual safeguarding training, which is delivered to all staff.

All disclosures and concerns recorded on CPOMs allows school to manage all areas of safeguarding and child protection, including pupil casework, add meetings to a child's chronology, staff training, and physical restraint incidents. This allows immediate follow up and management by the DSL on any issue.

If members of staff are in any doubt about recording requirements staff must discuss their concerns with the DSL.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in school. Safeguarding records are kept in accordance with data protection

and UK GDPR legislation and retained centrally and securely by the DSL and are shared with staff on a 'need to know' basis only.

All safeguarding, behavioural and restrictive intervention incidents will be monitored and reviewed holistically to identify emerging risks, patterns or unmet needs, ensuring a joined-up safeguarding response and informed next steps decision making.

13.2 SENSO

At De Lacy Primary School SENSO is our platform to support safeguarding monitoring of remote learning and school-based devices that are provided by Ark. The Assisted Safeguarding Monitoring Service continues to provide term/non term time support to our schools.

Senso is a cloud-based solution that will let us monitor and manage all computers and pupils throughout the network from a centralised web portal in real time.

DSLs/Team will receive alerts for safeguarding violations & review and action the critical and urgent alerts within forty-eight working hours. A top-level overview of all violations across a single or multi-site setup where teachers can monitor and manage their class with live thumbnails.

Exporting evidence when a Senso alert qualifies as a concern in CPOMS under the judgement of the DSL and weekly violation logs/reports provided to DSL & Head of School.

13.3 Confidentiality, information sharing and GDPR

All personal data will be handled and stored in accordance with Ark's Data Protection Policy

De Lacy Primary School recognises that all matters relating to child protection are confidential. The Head of School/DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information about children, families and colleagues, which have access to because of their role, confidential, they also have a professional responsibility to share information if it is necessary and proportionate with other agencies in order to safeguard children.

The Data Protection Act 2018 (DPA), UK GDPR or Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Everyone in this school who deals with personal data shares the responsibility for data protection.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Timely information sharing is essential to effective safeguarding.

De Lacy Primary School have clear powers to share, hold and use information for these purposes:

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without

consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk. The Data (Use and Access) Act 2025 further emphasises the importance of acting in the best interests of the child and reinforces that safeguarding remains a compelling reason for data sharing, even without consent.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

Regarding confidentiality if a victim asks the school not to tell anyone about the sexual violence or sexual harassment there is no definitive answer. This is because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.

- Staff shouldn't promise confidentiality as it might be in the victim's best interest to seek advice and guidance.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
 - Staff shouldn't promise confidentiality as it might be in the victim's best interest to seek advice and guidance.
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

At De Lacy Primary School regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

All staff are directed to the governments [information sharing advice for safeguarding practitioners](#) for further information which includes 7 'golden rules' for sharing information, and will support staff who must make decisions about sharing information as set out below:

1. The UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights law create a framework to support information sharing to ensure that personal information about living individuals is shared appropriately and where there is a risk to their safety.
2. Be open and honest with the individual (and / or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their parent(s) wherever possible, sharing information with consent. This means you should consider any objection the child or their carers may have to sharing, but where you believe sharing the information is necessary to protect the child from harm, any objections can be overridden. Under data protection you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk, and you will need to base your judgement for sharing this information on the facts of the case.
4. Seek advice from other practitioners or your data protection lead if you are in any doubt about sharing the information concerned, where possible without disclosing the identity of the individual(s) involved.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions; ensuring when sharing and receiving the information, you and/or the person or agency/ organisation work to protect that data to prevent details becoming known by others.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it: whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose, and if not, why and what risk you believe there is in sharing.

De Lacy Primary School ensures that policies, training and practice give staff the confidence to know when, how and to whom they can share sensitive information when dealing with a safeguarding concern. The annual safeguarding training also covers how to record that information in a neutral and professional manner, focusing on what is necessary for the safeguarding purpose. If staff are unsure about sharing information, they should speak to the DSL, Ark's Data Protection Officer or you Data Protection Lead in school.

13.4 Requests for access to safeguarding records

Safeguarding records are maintained separately from a pupil's educational record and are subject to additional safeguards due to their highly sensitive nature. The school has a duty of care to protect children and will carefully consider any request for access to safeguarding information on a case-by-case

basis. Information will only be disclosed where it is lawful, appropriate and where doing so would not place a child, or any other individual, at risk of harm.

The school will not automatically share safeguarding records with parents, carers or other individuals where there are concerns that disclosure may prejudice the safeguarding of a child, compromise ongoing safeguarding activity, or otherwise place a child or another person at risk.

Where a Subject Access Request (SAR) is received under data protection legislation, safeguarding records are not automatically disclosed as part of the response. Requests involving safeguarding information will be reviewed by the Designated Safeguarding Lead and, where appropriate, the Data Protection Officer. The school will consider whether disclosure is in the best interests of the child and whether any exemptions apply under the Data Protection Act 2018.

Where disclosure of safeguarding information is likely to cause serious harm to the physical or mental health of any individual, or otherwise place a child at risk, the school may rely on the exemptions contained within Schedule 3, Part 2, Paragraph 18 of the Data Protection Act 2018 to withhold relevant information where appropriate.

13.5 Transferring records

All safeguarding and child protection records will be transferred separately from the main pupil file, under secure and confidential arrangements, to the DSL at the receiving school or setting in accordance with data protection legislation. The DSL will ensure that the safeguarding and child protection file is transferred as soon as possible and, where possible, within 5 days of an in-year transfer or within the first 5 days of the start of a new term. In addition, the DSL will consider whether relevant safeguarding information should be shared in advance of the child leaving to enable appropriate support and safeguarding arrangements to be put in place at the receiving school or setting.

13.1. Data Breaches

Data breaches pose a significant risk to the safeguarding of pupils and their families. Where sensitive information is compromised, it can lead to a multitude of potential dangers, for example, the sharing of personal data such as home addresses, contact details, or family circumstances with the wrong individuals could potentially lead to harassment or exploitation. Therefore, it is crucial that we maintain robust data protection measures to prevent breaches and safeguard our pupils and their families.

School staff are provided with comprehensive training to prevent data breaches and safeguard our pupils and their families. This training includes understanding the importance of data protection, identifying breaches, potential risks and threats, and learning the best practices for handling and storing personal and sensitive data. Staff are trained on the use of secure systems and the importance of strong passwords, as well as being educated about phishing scams and other online threats that could lead to a data breach or potential access to pupil and family data.

Regular refresher training is delivered to ensure all staff are up to date with the latest data protection policies and procedures, are aware of their legal obligations and potential consequences of non-compliance. In addition, a culture of data protection is fostered within school, where staff are encouraged to report any potential data breaches or suspicious activities; and this proactive approach helps to mitigate risks and protect our pupils and their families from potential harm.

More information on Ark's approach to data breaches can be found in the Data Protection Data Breach Policy.

14. Appendix A – Ark Contacts

Trust Contacts

Ark Trust – Safeguarding Key Contacts		
Name	Role	Email
Caz Brasenell	Ark Regional Director (Pastoral)	Caz.Brasenell@arkonline.org
Jane Baldwin	Ark Head of Safeguarding	Jane.Baldwin@arkonline.org
Julian Appleyard	Regional Director	Julian.Appleyard@arkonline.org
Claire Kitchen	Regional People Business Partner	Claire.Kitchen@arkonline.org
David Allison	Regional Estates Manager	David.Allison@arkonline.org

Wakefield Safeguarding contacts

- Wakefield safeguarding partnership– <https://www.wakefieldscp.org.uk/>
- Children's First Hub / MASH –Advice & Support Service (CASS) 01977 723 591 Outside of normal office hours please call for the Emergency Duty Team for concerns about a child 0345 8503 503
- LADO – Local Authority Designated Officer – lado.referrals@wakefield.gov.uk - Telephone: 01977 727032
- Virtual School – Head of Virtual School name and email: Tom Foster virtualschool@wakefield.gov.uk - Telephone: 01924 304248
- Children Missing in Education team - 01924 307451 / ews@wakefield.gov.uk
- CSE Police Team - 01924 878 125 / DA.CSE@westyorkshire.pnn.police.uk
-

Inter-agency protocols

- Wakefield Children's Collaborative Working Data Sharing Agreement – <https://securefile.cloud/MTg2MTI/wftisaoctober2024v2.pdf>
- Targeted Family Support definition – <https://wakefield.mylocaloffer.org/early-help-service/targeted-early-help-service/>
- Child Protection Conference System - Principles, Protocols and Practice Standards – <https://www.wakefieldscp.org.uk/professionals/key-safeguarding-forms-tools-standards-frameworks/>
- Resolution and Escalation Protocol (multi-agency) - Resolution of Professional Disagreements about Safeguarding Children – <https://www.wakefieldscp.org.uk/wp->

<content/uploads/2021/11/Dispute-Resolution-Process-One-Minute-Guide.pdf>

- Forced Marriage Protocol – <https://www.westyorkshire.police.uk/about-us/policies-and-procedures/policies/crime-and-safeguarding/honour-based-abuse-and-forced-marriages>
- FGM Mandatory Reporting Protocol – <https://www.westyorkshire.police.uk/advice/child-protection/female-genital-mutilation/female-genital-mutilation>
- Sudden Unexpected Deaths in Infants & Children Under 18 (SUDC) <https://www.wakefieldscp.org.uk/resources/sudic-sudden-unexpected-death-in-childhood-omg/>
- {LA} Criminal Exploitation and Gang Affiliation Screening Tool – <https://hub.wakefieldscp.org.uk/welcome-page/ce-practitioners/child-criminal-exploitation/>
- (LA) Local toolkits, such as the Neglect toolkit and Harmful Sexualised Behaviour Protocol for Schools and screening tool. <https://hub.wakefieldscp.org.uk/neglect-toolkit/>

15. Appendix B – Policies

15.1 Relationships, Sex & Health Education (RSHE)

Please refer to RSHE on the school website.

15.2 Intimate care

It is essential that every child is treated as an individual and that care is given as gently and as sensitively as possible. As far as possible, the child should be allowed to exercise choice and should be encouraged to have a positive image of his/her own body. It is important for staff to bear in mind how they would feel in the child's position. Given the right approach, intimate care can provide opportunities to teach children about the value of their own bodies, to develop their safety skills, and to enhance their self-esteem. Parents and staff should be aware that matters concerning intimate care will be dealt with confidentially and sensitively, ensuring the young person's right to privacy and dignity is always maintained

15.1. SEND

Refer to the De Lacy Primary School SEND Policy.

15.2. Unexplainable and/or persistent absences from education

De Lacy Primary School has an attendance policy which it shares with staff, parents and pupils via the school website.

The attendance policy recognises that all schools have safeguarding duties under section 175 of the Education Act 2002 in respect of their pupils, and as part of this should investigate any unexplained absences and give due regard to this responsibility. The attendance policy is written in accordance with "Children missing education: Statutory guidance for local authorities" (August 2024).

15.3. Recruitment & Appointment Policy 2026/2027

Refer to Ark Recruitment and Appointment Policy and Ark Safer Recruitment process

15.4. Other Related Policies, Procedures and Guidance

We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies, guidance documents or procedures as listed below.

- **Behaviour Management, including use of restrictive interventions** – included in the Behaviour policy on individual schools website
- **Searching, screening and confiscation** advice for schools – (DfE guidance July 2022) is also covered in our behaviour policy on individual school website
- **Online Safety and Digital awareness** – covered within digital strategy, section within the Safeguarding policy and covered Online Safety Policy.
- **Anti-Bullying procedure** – included in the behaviour policy on individual school website
- **Data Protection and Information Sharing** – held on the Ark Policy Index
- **IT Acceptable Use Agreement** – held on the Ark Policy Index
- **Image Use** – no separate document, section included in IT Acceptable Use Agreement
- **Drugs & substance misuse** – Covered within schools PHSE policy
- **Relationships education, relationships and sex education (RSE) and health education** – included in individual schools policy - guidance on the statutory guidance index
- **Health and Safety** – held on Ark policy index
- **Procedure for Managing safeguarding concerns and allegations made about staff, trainee teachers, supply teachers, volunteers and non-Ark staff including contractors** – held on Ark policy index
- **Attendance (Children who are absent from education)** – Included in the attendance policy on individual schools website and included in the Safeguarding Policy
- **Risk Assessments** (e.g., school trips, use of technology,) – guidance and templates held on Ark Library within relevant team
- **First Aid and Accidents** – held on Ark policy on index
- **Code of Conduct for Staff** – individualised Code of Conduct in each school, Ark HR People Team provide advice
- **Complaints** – held on Ark policy index
- **Safer Recruitment** – no separate policy, sections within the Safeguarding policy (Appendix B) and Recruitment & Appointment Policy
- **Whistleblowing** – held on Ark policy index

15.5. Further reading

- Keeping Children Safe in Education (September 2026)
- Working Together to Safeguard Children (2023)

- The Children Act 1989 and 2004
- Children and Wellbeing in Education (2026)
- SEND code of practice: 0 to 25 years 2015 (update April 2020)
- Statutory framework for the Early Years Foundation Stage
- Children's Wellbeing and School's Act (2026)
- Education Act (2002)
- The Children and Families Act (2014)
- Disqualification under the Child Care Act (2006)
- Statutory Guidance on FGM
- Human Rights Act (1998)
- Mental Health & Behaviour in Schools (2018)
- What to do you're worried a child is being abused (2015)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Working together to improve school attendance: guidance for schools (update 2026)
- Children Missing Education (updated 2025)
- School suspensions and permanent exclusions (July 2026)
- Criminal Exploitation of children and vulnerable adults: County Lines guidance (October 2023)
- Teachers Standards 2011 (updated 2021)
- Online Safety Act 2023
- 'When to call the police' Guidance for schools and colleges, produced by the National Police Chiefs Council (NPCC, 2020).
- Domestic Abuse Act 2021
- The Equality Act (2010)
- Arranging Alternative Provision (2025)
- DfE Designated teacher for looked after and previously looked after children (February 2018)
- Use of reasonable force and other restrictive interventions in schools (September 2025)
- Children and Social Work Act 2017.
- DfE "Teaching Online Safety in Schools" (January 2023)
- Sharing nude and semi-nudes: advice for education settings working with children and young people (Dec 2020, updated March 2024)
- DfE 'The Safe and Effective Use of AI in Education' Leadership Toolkit (June 2025)
- DfE Data Protection: A Toolkit for Schools (April 2024)
- The Data Protection Act (2018)

- UK General Data Protection Regulation (UK GDPR)
- The Voyeurism (Offence) Act (2019)
- Serious Crime Act (2015)
- Crime and Policy Act (2026)
- Searching, Screening and Confiscation (update 2023)
- Local Authority Safeguarding Partnerships arrangements
- Care Act 2014
- Education and Training (Welfare of Children) Act

16. Appendix C – Further Information

16.1. Looked After Children (referred to as LAC)

A child who has been in the care of their local authority for more than twenty-four hours is known as a Looked after Child. Looked after children are also often referred to as children in care, a term which many children and young people prefer.

Looked after children are:

- living with foster parents
- living in a residential children's home or
- living in residential settings like schools or secure units.

There are a variety of reasons why children and young people enter care.

- The child's parents might have agreed to this – for example, if they are too unwell to look after their child or if their child has a disability and needs respite care.
- The child could be an unaccompanied asylum seeker, with no responsible adult to care for them.
- Children's services may have intervened because they felt the child was at significant risk of harm. If this is the case the child is usually the subject of a court-made legal order.

A child stops being looked after when they are adopted, returns home or turns eighteen. However local authorities are required to support children leaving care at eighteen until they are at least twenty-one. This may involve them continuing to live with their foster family.

Designated Teacher – Looked After Child (LAC) & Previously Looked After Child (PLAC)

De Lacy Primary School designated leads for Looked After Children.

The designated person will have a critical role in helping other members of staff to understand how different things may affect Looked After and Previous Looked After Children. They will be aware of the emotional, psychological, and social effects of separation and loss from birth families.

Please visit for further DfE guidance - [Promoting the education of looked-after children and previously looked-after children](#).

16.2. Off-site directions and Alternative Provision (AP)

At De Lacy Primary School we are responsible for the safeguarding of our pupils when they receive an off-site direction, including alternative provision.

There are different situations in which pupils are placed in an alternative provision, schools can use such provision to try to prevent permanent exclusion, or to re-engage pupils in their education, or to improve behaviour. The decision-making process should be supported by a referral to Targeted Family Support.

At De Lacy Primary School when it is decided to place a pupil at an AP we will ensure:

- non-registered provisions **should not** be used
- carefully considering the provision for vulnerable pupils or pupils where there are any safeguarding concerns at home, pupils with an EHCP, certain health conditions or CiC.

- to carry out a risk assessment on the alternative provisions.
- use of the provision should be time-limited (i.e. review regularly, clear timescales)
- to obtain written confirmation from the AP provider that they have completed all the vetting and barring checks that are necessary on their staff.
- To appoint designated teacher at school to track pupil progress and to make sure the pupil is attending daily, completing work and accessing tutors when necessary.
- It should be clear at the commissioning meeting, and put in writing, where the day-to-day responsibility is going to lie in locating a missing pupil.
- Outside of the safeguarding remit, schools should also have a sense of how the alternative provider is helping the young person with their personal development.

Managed move is a voluntary agreement between schools, parents/carers and a pupil, for that pupil to change school or educational programme under controlled circumstances. A managed move is different to the power of a school to direct a pupil off-site for the improvement of their behaviour.

At De Lacy Primary School when it is agreed to arrange a managed move for a pupil, we follow our managed move protocol. As schools have to rely on the safeguarding procedures of the new school, at De Lacy Primary School we ensure that the managed move protocol of the new school/borough has a safeguarding paragraph, the policy and training of staff is adequate, and these checks are completed before a child moves to the new school.

Under the Education Inspection Framework Sept 2019 (updated 2023), school is aware that in their pre-inspection phone call, Ofsted will ask how many alternative providers does the school use, and how many children are placed there. Inspectors may visit AP's and assess their safeguarding procedures, the quality of education and how effectively the provision helps to improve pupil's behaviour, learning, attendance and safeguarding.

16.3. The use of school premises by other organisations

De Lacy Primary School should ensure when hire or rent out of school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) that appropriate arrangements are in place to keep children safe.

When services or activities are provided under the direct supervision or management of De Lacy Primary School staff, their arrangements for child protection will apply.

Where services or activities are provided separately by another body using the school premises, the Head of School will seek written letters of assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.

Safeguarding requirements should also be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this may lead to termination of the agreement.

All external services using school premises will adhere to the school's lettings agreement. If this assurance is not achieved, then an application to use premises will be refused.

School can seek further advice from their Regional Facilities Manager.

16.4. Site Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may become known. De Lacy Primary School operate within a whole-school community ethos and welcome comments from pupils, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the school's visitors log system and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

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

17. Appendix D - Signs and indicators of abuse, neglect and exploitation

17.1. What is Child Abuse?

The following definitions align with Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026. In addition to these definitions, children can also be abused by honour-based violence, forced marriage or female genital mutilation.

17.2. What is abuse and neglect?

Abuse and neglect are forms of maltreatment. 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, institutional or community setting, by those known to them or, more rarely, by others, including via online technology. 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.

17.3. What is physical abuse?

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

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)

- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g. electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult's words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

17.4. What is emotional abuse?

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to 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 or 'making fun' of what

they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.

Indicators of emotional abuse/Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc.)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late or vice versa.

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

17.5. What is sexual abuse?

Involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children. Children are also more likely to know their abuser than not.

Children under the age of 13 can never legally consent to a sexual activity.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child’s environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Indicators of sexual abuse Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity

- Hinting at sexual activity Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality such as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour, onset of wetting, day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Withdrawal from physical activities
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

17.6. What is Neglect?

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

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is a lack of parental care, but poverty and lack of information or adequate services can also be contributory factors.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly

- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

17.7. Signs and Indicators of CCE/CSE/County Lines

Child Sexual Exploitation

Children and young people under the age of sixteen cannot, by law, consent to sexual intercourse and anyone engaging in sexual activity with a child under the age of sixteen is committing an offence. Whilst the age of consent is sixteen, it is illegal for those under eighteen to be paid for sexual services in money or in kind. All children involved in sexual exploitation should be treated as victims of abuse, even those aged between 16 and 18. Concern that a child, young person or vulnerable adult may be involved in sexual exploitation or at risk of being drawn into it should always initiate action to ensure child's safety and welfare.

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

(National Working Group for Sexually Exploited Children and Young People 2008)

Although the definition of sexual exploitation is long and detailed, in essence such abuse is characterised by children and young people receiving goods, favours or money in return for sexual activities. In all such exploitation, the balance of power remains with the abuser(s) through age, intellect or resources.

Children are at risk of sexual exploitation through the internet and, particularly social media. Young people may be groomed to share indecent images with others on the internet, who may be adults posing as teenagers. The prevalence of 'sexting' is a significant risk factor.

Models of Sexual Exploitation

Three models of sexual exploitation have been identified;

Inappropriate Relationship	Boyfriend	Organised Crime
One abuser Power and control Physical, emotional, financial Believe abuser is offering a genuine relationship Often a significant age gap	Initially, one abuser, grooming and gaining trust Apparently consensual sexual relationship starts Relationship becomes abusive Victims are threatened with violence and forced to engage in sexual activity with others Growth in peer exploitation	Involving criminal gangs trafficking victims around the UK and the world Established networks across the UK move victims from location to location Forced or coerced into sexual activity with multiple partners Involves buying and selling of young people

Sexual exploitation affects both males and female. Services working with sexually exploited young people suggest that around a third of victims are male. There are several risk factors which raise the risk of such abuse:

- a history of running away or going missing
- homelessness
- those in care or care-leavers (especially residential care)
- young people with learning difficulties
- permanent exclusion
- migrant children
- unaccompanied asylum-seeking children
- those disengaged from education
- young people involved in substance misuse
- young people in gangs
- poor mental health
- parental drug/alcohol misuse
- disrupted family life
- domestic violence

- history of physical or sexual abuse

Sexual exploitation takes many forms, and a range of coercive techniques is used from grooming and the development of a 'consensual' relationship, through to extreme violence. Abusers target areas where children and young people meet with a reduced level of supervision, including shopping centres, takeaways, cinemas, bus or train stations and local parks. Much of this exploitation occurs in private, away from known areas of prostitution, saunas or massage parlours.

Warning Signs

- Going missing for periods of time
- Returning home late
- Disengagement from education
- Poor school attendance (including truancy and suspensions)
- Appearing with unexplained gifts: clothes, jewellery, trainers, phones, money
- Associating with others involved in sexual exploitation
- Frequently in the company of older people, particularly boyfriends or girlfriends
- Poor sexual health
- Mood swings/poor anger control/changes in emotional well-being
- Drug and alcohol misuse (often a method of increasing compliance)
- Inappropriate sexualised behaviour, especially around strangers
- Association with 'risky' adults
- Chronic tiredness
- Secretive behaviour
- Low-level crime, e.g. Shoplifting
- Self-harm
- Talking about visiting different areas, especially at night

17.8. Child Criminal Exploitation (CCE)

The Home Office definition:

'Child criminal exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of eighteen. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children... includes for instance children forced to work on cannabis farms or to commit theft'.

Criminal exploitation has received considerable media coverage in the last year and there is a particular focus on the risks of county lines activity. This is when individuals or gangs use vulnerable children and

adults to transport and sell Class A drugs, primarily from urban areas into market or coastal towns or rural areas to establish new drug markets or take over existing ones. They also use children to transport and hide weapons and to secure dwellings of vulnerable people in the area, so that they can use them as a base from which to sell drugs.

17.9. County Lines

County lines is a term used to describe criminal networks involved in the exporting and selling of illegal drugs from urban areas into other locations across England and Wales, using dedicated mobile phone lines or other forms of 'deal line'. Children and vulnerable adults are frequently exploited to facilitate this activity.

Criminal exploitation is a common feature of county lines activity, with children being used to transport, store and sell drugs, weapons and money. Children may be exploited through coercion, control, intimidation, violence (including sexual violence), debt bondage and the use or threat of weapons.

Children can become trapped by this form of exploitation as perpetrators often create drug debts and use threats, assault, kidnapping and serious violence against victims and their families to maintain control. Children involved in county lines may be victims of exploitation even where they appear to be offending.

Indicators of county lines involvement and criminal exploitation may include:

- persistently going missing from home or education;
- travelling to locations outside their local area;
- being found in possession of drugs, money or weapons;
- acquiring unexplained money, gifts, clothing or mobile phones;
- an increase in school absence or a decline in educational performance;
- associations with older individuals or gangs;
- receiving excessive phone calls, messages or having multiple mobile phones; and
- displaying signs of physical assault, intimidation, self-harm or emotional distress.

Staff should be aware that a child may be criminally exploited without their knowledge or consent and should report any concerns immediately to the DSL and log on CPOMS. A child involved in county lines activity should always be regarded as a victim of exploitation and referred for safeguarding support.

17.10. Serious Violence

All staff should be aware of the indicators which may signal that a child is at risk from, or involved with, serious violence or 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;

- signs of assault or unexplained injuries; and
- concerns that a child may be carrying a weapon, has used a weapon, or has expressed an intention to use a weapon.

Unexplained gifts, money or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

De Lacy Primary School recognises that children are more vulnerable to involvement in serious violence where risk factors are present. These risk factors may include:

- being male;
- persistent absence from education or permanent exclusion;
- having experienced abuse, neglect or child maltreatment;
- having been involved in offending behaviour, including theft, robbery or other criminal activity;
- association with gangs, criminal networks or exploited peer groups; and
- other vulnerabilities that increase a child's risk of exploitation or harm.

Where staff have concerns that a child may be involved in serious violence, including concerns about carrying, using or intending to use a weapon, they should report this immediately to the Designated Safeguarding Lead (DSL). The DSL will assess the level of risk and take appropriate action, including working with relevant agencies and implementing measures to de-escalate and reduce the risk of harm.

Further information about serious violence can be found in Keeping Children Safe in Education 2026 Part One and Annex A and in Working Together to Safeguard Children 2026.

17.11. Honour Based Abuse (HBA)

So-called 'honour-based' abuse (HBA) 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 HBA 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 HBA, they must inform the Designated Safeguarding Lead as a matter of urgency.

Further information about 'honour-based' abuse (HBA) including definitions and indicators is included in KCSIE 2026 Annex A.

17.12. Signs and symptoms of Female Genital Mutilation (FGM)

FGM is an illegal, extremely harmful practice and a form of child abuse and violence against women and girls.

FGM is a collective term for all procedures involving partial or total removal of external female genitalia for cultural or other non-therapeutic reasons. Typically, it is performed on girls aged between four -15 or on older girls before marriage or pregnancy. **It is illegal in the UK, and it is also illegal to take a child**

abroad to undergo FGM. There is a maximum prison sentence of 14 years for anyone found to have aided this procedure in any way.

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

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), **there is a specific mandatory legal duty on teachers** where, in the course of their professional duties, discovers (e.g. through disclosure by the victim) that FGM appears to have been carried out on a girl under 18, they must report this to the police.

The mandatory reporting duty does not apply to suspected or at-risk cases. In these circumstances, staff should immediately share with the DSL and record on CPOMS.

Once concerns have been raised about FGM, there should also be consideration of potential risk to other girls in the family and practicing community. Professionals should be alert to the fact that any one of the girl children amongst these groups could be identified as being at risk of FGM and may need to be safeguarded from harm.

This [link](#) provides full guidance for mandatory reporting.

Further information about FGM, including resources for schools, can be found here:

<http://nationalfgmcentre.org.uk/>

17.13. Prejudice based harm and faith targeted abuse

Prejudice-based harm includes experiences of racism, faith-targeted abuse, and other forms of discriminatory behaviour directed towards a child because of a protected characteristic, perceived difference, or identity. Such experiences can have a significant impact on a child's welfare, wellbeing, mental health, sense of safety, and willingness to seek help.

All staff should recognise that prejudice-based harm may be a safeguarding concern and should remain alert to the signs, impact, and effects of discriminatory behaviour on children and young people. Concerns should be considered and responded to within safeguarding practice where appropriate.

Where staff are concerned that a child is experiencing prejudice-based harm, including racism, faith-targeted abuse, or other forms of discrimination, they must record and report their concerns to the DSL and record on CPOMS in accordance with the school's safeguarding procedures.

17.14. Contextual safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that

young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

At De Lacy Primary School we work closely with children's social care practitioners, child protection systems and wider safeguarding partnerships to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

At De Lacy Primary School all staff assess the risks and issues in the wider community when considering the well-being and safety of its pupils.

Extra-familial contexts include young people's peer groups, support networks, online contacts, and local community or neighbourhood. Safeguarding concerns in these contexts could consist of harassment or violence from their peers, a risk of grooming – whether online or in person – high levels of crime or gang violence in your local area, or even a local park where frequent incident reports have been made.

As well as involving wider consideration of contexts, contextual safeguarding entails a different method of intervention from the traditional approach. In the past, all interventions took place with the young person and their family, regardless of where the harm originated from. However, it has been shown that this is inadequate in cases of extra-familial abuse; parents do not have any control over these outside contexts and cannot change them.

Further information relating to contextual safeguarding is included in KCSIE 2026 Annex A.

17.15. Domestic Abuse

The Domestic Abuse Act 2021 defines domestic abuse as any incident or pattern of incidents between individuals aged 16 or over who are personally connected to each other. Domestic abuse can encompass a wide range of behaviours, including:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse; and
- psychological, emotional or other abuse.

Economic abuse means any behaviour that has a substantial adverse effect on a person's ability to acquire, use or maintain money or other property, or to obtain goods or services. A person is regarded as 'personally connected' to another person if they:

- are, or have been, married to each other;
- are, or have been, civil partners;
- have agreed to marry one another;

- have entered into, or agreed to enter into, a civil partnership;
- are, or have been, in an intimate personal relationship with each other;
- have, or have had, a parental relationship in relation to the same child; or
- are relatives.

Children can be victims of domestic abuse in their own right. They may see, hear or experience the effects of abuse at home and/or suffer the impacts of abuse occurring between family members. Exposure to domestic abuse can have a serious and long-lasting effect on a child's health, wellbeing, development and ability to learn.

Indicators that a child may be affected by domestic abuse can include:

- anxiety, depression or low self-esteem;
- withdrawal, isolation or changes in behaviour;
- emotional distress or excessive worry about parents or carers;
- poor attendance or reduced engagement in education;
- aggression, challenging behaviour or difficulties with peer relationships;
- tiredness, poor concentration or changes in academic performance; and
- experiencing or witnessing controlling, coercive, threatening or violent behaviour within the home.

Staff should be aware that domestic abuse may be a factor in safeguarding concerns and should report any concerns to the DSL in accordance with the school's safeguarding procedures. Early identification and support are essential to safeguard children affected by domestic abuse.

Further information about domestic abuse can be found in the Keeping Children Safe in Education 2026 Annex A and Working Together to Safeguard Children 2026.

17.16. 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) with someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. It is not private fostering if the arrangement was made by social services.

Examples of private fostering situations include:

- children and teenagers living apart from their families for a variety of reasons e.g. if a parent is ill, has had to temporarily move for work or there has been an argument within the family
- children with parents working or studying elsewhere in the UK
- children with parents overseas
- children on holiday exchanges.

Current arrangements for the regulation of private fostering originate from concern following the death

of Victoria Climbié in 2000. Victoria was privately fostered by her great aunt. Arrangements were codified in the Children Act 2004. Following this, the Children (Private Arrangement for Fostering) Regulations 2005 set out the duties of local authorities in their arrangements for private fostering, and national minimum standards for local authorities were published in 2005.

17.17. Kinship Care

Kinship care refers to the arrangement whereby family members or close friends assume the responsibility of caring for a child when their parents are unable to do so due to circumstances such as bereavement, illness, imprisonment, substance misuse, or neglect.

Kinship carers are often grandparents, aunts, uncles, siblings, stepparents, or trusted individuals with a strong connection to the child. Some children in Kinship care may have an allocated social worker, particularly if they are subject to a Child in Need plan, Child Protection plan, or are looked after under a legal order; others may not, depending on the nature of the arrangement.

Schools play a vital role in recognising and supporting the unique needs of children in kinship care by fostering a nurturing and inclusive environment, ensuring access to pastoral and academic support, and working collaboratively with carers. The Virtual School within the Local Authority provides additional oversight and guidance, helping to ensure that children in Kinship care receive appropriate educational support and that their progress is monitored effectively in line with their needs. Through coordinated efforts, school and the Virtual School can help mitigate the impact of trauma and disruption, promoting stability and positive outcomes for children in Kinship arrangements.

18. Appendix E - Safeguarding Issues that can place children at risk of harm (external links to further guidance/advice)

[Abuse](#)

[Bullying including cyberbullying](#)

[Children and the Court System \(Ages 5-11\)](#)

[Children and the Court System \(Ages 12-17\)](#)

[Children with family members in prison](#)

[Child Missing from Education](#)

[Child Missing from home or care](#)

[Child Sexual Exploitation \(CSE\)](#)

[Criminal exploitation of children and vulnerable adult's county lines](#)

[Domestic Abuse](#)

[Drug Advice for Schools](#)

[Fabricated or induced illness](#)

[Faith or Belief Based Abuse](#)

[Female Genital Mutilation \(FGM\)](#)

[Forced Marriage](#)

[Gangs and Youth Violence](#)

[Violence against women and girls \(VAWG\)](#)

[Hate](#)

[Homelessness](#)

[Mental health](#)

[Child on child](#)

[Private fostering](#)

[Consensual and non-consensual sharing nudes and semi nudes](#)

[Prevent Duty: safeguarding vulnerable learners](#)

[Serious Violence](#)

[Trafficking and modern slavery](#)

[Up-skirting](#)

[Kinship Care](#)