



**Wigan[♥]
Council**

Safeguarding, Child Protection and Family Help Policy

September 2026



Willow Grove Primary School

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Key Contacts

Table of identified persons with specific lead responsibilities in relation to Safeguarding and other key agencies:

NAME	ROLE	CONTACT DETAILS
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Taylor Davidson	Team Manager – Pupil Inclusion.	PupilInclusion@wigan.gov.uk
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Introduction

This policy has been developed in accordance with the principles established by:

- The Children Act 1989 (amended in 2004).
- The Education Act 2002.
- The Safeguarding Vulnerable Groups Act 2006.
- The Children and Social Work Act 2017.

In addition to the revised documents.

- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education September 2026.
- Working Together to Improve School Attendance 2026.

Other key documents are noted, which have prompted changes to safeguarding requirements over time. This policy references these throughout where relevant:

- UK GDPR and the Data Protection Act 2018 and Data (Use and Access) Act 2025.
- Information Sharing: Advice for Safeguarding Practitioners 2024.
- Childcare Act 2006 (as amended in 2018).
- The Human Rights Act 1998.
- The Equality Act 2010.
- Sexual Offences Act 2003.

This policy should also be read in conjunction with Wigan's Safeguarding Continuum Document¹ / Procedure and Wigan's Resolution Protocol² as well as the Families First Partnership Programme Guide³.

Safeguarding is defined as:

- ensuring that children grow up with the provision of safe and effective care;
- taking action to enable all children to have the best life chances;
- preventing impairment of children's health or development and
- protecting children from maltreatment.

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates pupil health and safety; behaviour and preventing bullying; supporting pupils with medical conditions; personal, health, social economic education; providing first aid and site security. Consequently, this policy is consistent with all other policies adopted by The Governing Body and should be read alongside them.

The aim of this policy is to ensure that:

- All of our students are safe and protected from harm;
- Safeguarding procedures are in place to help pupils and students to feel safe and learn to stay safe;
- Adults are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection;
- All agencies are providing appropriate support through the adoption of the Families First Partnership (FFP) programme and the graduated approach to SEND.

This will be achieved by:

- Supporting the development of our children in ways that will foster security, confidence and independence;
- Providing a high quality, safe and stimulating environment in which our children feel safe, secure, valued and respected, feel confident, and are able to enjoy, learn and grow in confidence;
- Supporting our children to develop positive relationships with the adults caring for them and making sure they know how to approach adults if they are in difficulties, believing they will be effectively listened to;
- Raising the awareness of all teaching and non-teaching staff of the need to safeguard children and young people, of their responsibilities in identifying and reporting possible cases of abuse (reference **Appendices 1 and 2**) and preventing and intervening earlier to address support and social needs of young people through the Families First Partnership (FFP) programme;

¹ [The Right Support at the Right Time](#) – Wigan's Continuum of Need document

² Escalation policy recently update to Resolution Protocol [Resolution Protocol \(wigansafeguardingchildren.co.uk\)](#)

³ [FFP Programme guide: delivery expectations for statutory safeguarding partners in England: year 2 \(2026 to 2027\)](#)

- Providing a systematic means of monitoring children known to be or thought to be at risk of harm and ensuring we contribute to assessments of need and support packages for those children;
- Emphasising the need for good levels of communication between all members of staff;
- Developing a structured procedure which will be followed by adults within our community in cases of suspected abuse and ensuring that staff have had access to annual safeguarding training that includes:
 - coercive control
 - deepfakes and image-based abuse
 - Child on child harmful sexual behaviour
 - Online safety responsibilities
 - Early/Family Help pathways
 and are made aware of the following documentation:
 - Staff code of conduct (for safer working practice)
 - KCSIE Part 1
 - Preventing Radicalisation
 - Whistleblowing
 And the most vulnerable children in their care, particularly:
 - Looked After Children (CLA)
 - Children with a Family Help or Child Protection Plan
 - Children with identified SEND
 - Children with medical needs

- Developing and promoting effective working relationships with other agencies, especially the Police, Health and Social Care;
- Ensuring that all of our staff with substantial access to our children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check ⁴(according to guidance) and a single central record is kept for audit;
- Ensuring that our children access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life. Providing opportunities for our children to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. The PSHE/RSHE curriculum specifically includes the following objectives:
 - Developing pupil self-esteem and communication skills
 - Developing strategies for self-protection including online safety
 - Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

This policy must be read in conjunction with Keeping Children Safe in Education⁵

⁴ Guidance regarding DBS checks was updated by the Protection of Freedoms Act 2012
<https://www.gov.uk/db-check-applicant-criminal-record>

⁵ [Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#)

Keeping Children Safe in Education is statutory guidance that education settings in England must have regard to when carrying out their duties to safeguard and promote the welfare of children applying to:

- Governing bodies of maintained schools (including maintained nursery schools) and colleges;
- Proprietors of independent schools (including academies, free schools and alternative provision academies) and non-maintained special schools. In the case of academies, free schools and alternative provision academies, the proprietor will be the academy trust; and
- Management committees of Pupil Referral Units (PRUs).

Scope

As outlined in the Introduction section of this policy, the term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe through the Family Help framework that incorporates health and safety; behaviour for learning and preventing bullying; supporting children with medical conditions; personal, health, social economic education; providing first aid and site security.

All staff are aware of the categories of abuse, which are:

- Physical abuse
- Emotional Abuse
- Neglect
- Sexual abuse

The definitions of which can be found in the glossary at the end of this policy. Signs and symptoms of the four categories of abuse can be found in **Appendices 1 and 2**.

This policy assumes that any of the categories of abuse could be disclosed within the Borough of Wigan and gives further information relating to individual types of abuse within this document in line with advice and guidance within Keeping Children Safe in Education 2026.

Expectations

All staff are:

- familiar with this safeguarding policy and have an opportunity to contribute to its review.
- alert to signs and indicators of possible abuse.
- able to record and report concerns as set out in this policy.
- able to deal appropriately with a disclosure of abuse from a pupil.
- involved in the implementation of individual education programmes, integrated support plans, family help plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 of the latest version of Keeping Children Safe in Education (KCSIE 2026). The school may use the KCSIE Overview for Staff document as a quick reference guide but understand that this does not replace the requirement for all staff to read and understand Part 1 of KCSIE.

We recognise that all adults, including temporary staff⁶, volunteers and The Governing Body, have a full and active part to play in protecting our children from harm, and that their welfare is our paramount concern.

All staff believe that our setting should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of each child.

We recognise that children who are neglected, abused or who witness violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of worth.

We recognise that children may respond to these circumstances in a range of ways, and their behaviour may vary from appearing unaffected to displaying signs of distress, aggression, anxiety, or withdrawal.

We recognise that children who display violent behaviour may themselves be vulnerable, exploited or experiencing harm and we will consider safeguarding needs alongside any behavioural response.

We recognise that our setting may provide the only stability in the lives of children who have been abused or are at risk of harm.

We recognise that the Family Help approach provides opportunities to intervene early and prevent safeguarding issues developing, as well providing a framework for appropriate support to be wrapped around children and their carers.

⁶ Wherever the word “staff” is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc, and Governors/Trustees

Responding to concerns / disclosures of abuse

Staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

Do:

- Create a safe environment by offering the child a private place to talk.
- Stay calm, reassure the child and stress that they are not to blame.
- Tell the child that that they know how difficult it must have been to confide in them and will treat what they say seriously.
- Explain that information may need to be shared with appropriate professionals if there are concerns about the child's safety or wellbeing.
- Listen carefully and tell the child what they are going to do next.
- Use open questions such as 'tell me', 'explain', 'describe' and/or mirroring strategy.
- Report concerns to the Designated or Deputy Designated Safeguarding Lead only.
- Record in detail using the Welfare Concern Record without delay, using the child's own words where possible.

Don't:

- Take photographs of any injuries.
- Postpone or delay the opportunity for the child to talk.
- Take notes while the child is speaking or ask the child to write an account.
- Try to investigate the allegation themselves.
- Promise confidentiality or agree to keep secrets.
- Approach or inform the alleged abuser.

All staff record any concern about or disclosure by a pupil of abuse or neglect and report this to the D/DSL using the standard form. It is the responsibility of each adult in the school to ensure that the D/DSL receives the record of concern without delay.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

In some circumstances, the D/DSL or member of staff seeks advice by ringing Children's Social Care.

During term time, the D/DSL is always available during school hours for staff to discuss any safeguarding concerns.

The voice of the child is central to our safeguarding practice and children are encouraged to express their views and reassured that they are listened to in all matters affecting them.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

If we become aware that a child is subject to a private fostering arrangement, we ensure that the parent and/or private foster carer understands their legal duty to notify Wigan Children's Social Care. We then make direct contact with Children's Social Care (CFPH: 01942 828300) to verify that the Local Authority has been notified of the arrangement.

Safe Setting, Safe Staff

Our Health and Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the setting environment and, for example, in relation to internet use, and when away from the education setting, undertaking off site trips and visits.

School security guidance has been compiled to support the senior management of educational settings in the discharge of their responsibilities by ensuring the development and implementation of suitable procedures. In particular, maintaining the security of the premises in response to potential threats to the staff and pupils of the setting as well as protecting pupils from online harm.

Willow Grove will ensure that:

1. The Governing Body takes seriously its responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children. We recognise that safeguarding is everyone's responsibility and are committed to working in partnership with other agencies to identify, assess and support children who are suffering, or who may be at risk of suffering, abuse, neglect or exploitation, and to ensure that appropriate safeguarding arrangements are in place within the setting.

As those responsible for the strategic leadership and direction of the school, the Governing Body will ensure that our policies and procedures are aligned with national and local safeguarding requirements. They will work with senior leaders to ensure that the key actions set out in Safe Settings, Safe Staff are in place:

- There is a Safeguarding, Child Protection and Family Help policy together with a staff behaviour (code of conduct) policy.
- An accurate and compliant Single Central Record is maintained, which provides a clear and auditable record that the setting has undertaken the statutory safeguarding and safer recruitment checks required for all staff, volunteers, contractors and Governors.
- We follow safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training.⁷
- We have appropriate filtering and monitoring systems in place to safeguard pupils and staff when accessing the internet and digital technologies.
- Filtering and monitoring arrangements are reviewed at least annually, or sooner where safeguarding risks change, and records of these reviews are maintained.
- The Governing Body receives assurance that filtering and monitoring systems are effective and proportionate, taking account of the age range of pupils, the context of the setting and emerging risks, including those associated with Generative Artificial Intelligence (AI).
- We have procedures for managing allegations and concerns relating to staff, supply staff, contractors and volunteers. We will make a referral to the Disclosure and Barring Service (DBS) where an individual engaged in regulated activity has been dismissed or removed from working with children due to safeguarding concerns, or would have been removed had they not resigned, retired or otherwise left their role.
- A senior leader has Designated Safeguarding Lead (DSL) responsibility.
- On appointment, the DSL undertakes interagency training and also undertakes DSL “new to role” training and an “update” course every 2 years.
- All other staff have access to safeguarding training as required and at least annually where needed, to ensure their knowledge and skills remain up to date. This includes regular updates in e-safety and reporting concerns.
- Any weaknesses in Child Protection processes and procedures are remedied immediately.
- A member of the Governing Body, usually the Chair, is nominated to liaise with the LA on safeguarding issues and in the event of an allegation of abuse made against the Headteacher.
- Safeguarding, Child Protection and Family Help policies and procedures are reviewed annually and the Safeguarding, Child Protection and Family Help Policy and Wigan's Continuum of Need document, *The*

⁷ Safer recruitment training can be accessed through Wigan Safeguarding Children's Partnership (wscptraining@wigan.gov.uk)

Right Support at the Right Time, are available on the setting's website or can be provided upon request.

- The Governing Body ensures that our children are taught about safeguarding, including online safety, through a broad and balanced curriculum. The content and delivery of safeguarding education is age-appropriate and tailored to the needs of pupils and the setting. This is delivered through PSHE lessons (where applicable), assemblies and other curriculum opportunities. This includes, but is not limited to:
 - Online safety and safe use of technology
 - Developing self-esteem, resilience and communication skills
 - Strategies for recognising risk and seeking help and support
 - Keeping themselves safe, including online and in the community
 - Understanding healthy, respectful and positive relationships, including consent and appropriate boundaries
 - Recognising inappropriate, harmful or abusive behaviours
 - Other safeguarding themes relevant to the age, needs and context of our children

- **Only include if you are a maintained school**

Enhanced DBS checks are in place for all staff and Governors. Section 128 checks are in place for all Governors. Individuals who engage in regulated activity have undergone a children's barred list check.

- Any Associate Members appointed by the Governing Body to serve on one or more governing body committees have Enhanced DBS checks.
 - Any staff appointed to teaching posts who hold qualifications from outside of the UK have obtained Qualified Teacher Status (QTS) in England, where this is required for their role.
 - The nominated Governor (NG) for safeguarding liaises with the Headteacher and the D/DSL to complete an annual Section 175 safeguarding audit to return to the local authority.
2. The DSL is a member of the Senior Leadership team who possesses the status, authority, skills, knowledge and experience required to carry out the role effectively. The DSL has; along with the Deputy Designated Safeguarding Lead(s), undertaken the relevant training, and, upon appointment will undertake DSL new to role training followed by refresher training every 2 years.
 3. The name of the designated members of staff for child protection (D/DSL) will be clearly visible in the setting, with a statement explaining the setting's role in referring and monitoring cases of suspected abuse.
 4. The setting has robust contingency arrangements to ensure safeguarding concerns can always be received and acted upon in the absence of the DSL. This may include use of Deputy DSLs, a shared safeguarding mailbox, secure recording systems and clear escalation routes for staff.
 5. The D/DSL have a clear understanding of the filtering and monitoring systems operating within the school and work with relevant staff to ensure that any safeguarding concerns identified through monitoring arrangements are acted upon promptly and appropriately.

6. All new members of staff are provided with a copy of our safeguarding statement and Safeguarding, Child Protection and Family Help policy which clearly displays the D/DSL's name, as well as Wigan's Continuum of Need document, *The Right Support at the Right Time*, as part of their induction.
7. All other staff, volunteers and the Governing Body, have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
8. Child protection and safeguarding concerns or allegations against adults working in the setting are referred to the LADO⁸ for advice and any member of staff found not suitable to work with children will be reported to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.
9. All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of our Safeguarding, Child protection and Family Help policy. Parents/carers are entitled to a copy of this policy, which is available on our website or can be provided upon request.
10. All visitors complete a sign in / out form, wear a school ID badge and are provided with safeguarding information including the contact details of safeguarding personnel.
11. All professional visitors are required to provide evidence of their identify and professional status, typically in the form of an official photo identification badge, upon arrival at the setting. A supporting letter in relation to DBS checks of visitors working for Wigan Council can be found in **Appendix 5**.
12. Community users organising activities for children are aware of the setting's child protection guidelines and procedures.
13. Our lettings policy, for community use of the premises, seeks to ensure the suitability of adults working with children on site at any time. If we receive an allegation relating to an incident during the letting period, we will follow our safeguarding policies and procedures as standard, including informing the LADO.
14. Our procedures will be annually (as a minimum) reviewed and updated.

⁸ LADO - for allegations against staff. LADO threshold document can be found here <https://www.wigan.gov.uk/Docs/PDF/WSCB/LADO-threshold.pdf>

Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all of our staff, volunteers and Governors. Our policy and procedures also apply to after-school and off-site activities.

Our setting plays a crucial role in preventative education as part of our whole-school approach to preparing pupils for life in modern Britain, and a culture that challenges sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical and emotional violence and conflict. This is underpinned by our policies, curriculum and the support system in place at the setting.

The DSL takes lead responsibility for safeguarding and child protection in the setting. This includes understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

If it is necessary to raise a safeguarding concern out of school hours, this can be directed to enquiries@admin.willowgrove.wigan.sch.uk or headteacher@admin.willowgrove.wigan.sch.uk and it will be prioritised the following school day. If a child is in **immediate** or **imminent** risk of danger, we strongly advise anyone wanting to raise the safeguarding concern to contact Greater Manchester Police on either 101 or 999.

When the DSL is absent, the DDSL's will take responsibility for safeguarding in the setting.

If the DSL and their replacement are not available or absent, the arrangements in place are:

- That a member of the Safeguarding team is available. They have all received DSL level training.
- There will always be a named member of the Safeguarding Team on site if the DSL/DDSL are not absent.

The DSL is responsible for:

1. Taking lead responsibility for safeguarding and child protection, including online safety, understanding the filtering and monitoring systems and processes in place.
2. Providing advice and support to staff on child welfare and child protection matters.
3. Referring a child if there are any concerns about possible abuse, to the local authority or relevant body, i.e. Police, Prevent, and acting as a focal point for staff to discuss these concerns.

4. Keeping written records of concerns about a child even if there is no need to make an immediate referral.
5. Ensuring that all such records are kept confidentially, securely stored and are separate from pupil records and held by the setting until the child's 25th birthday.
6. Making sure when a child leaves our setting, any information regarding safeguarding (current or historic) as well as the child protection file, where applicable, is transferred to the new education setting as soon as possible. This is transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt is obtained. In the instance of Family Help intervention, consideration will be given to the welfare of the child and consult with the family for appropriate transfer of information. Where there are significant safeguarding concerns, serious violence concerns, harmful sexual behaviour concerns or risks to self or others, the D/DSL will directly discuss these concerns with the DSL in the next educational setting.
7. Ensuring that an indication of the existence of the additional file outlined above is clearly marked on the pupil's records.
8. When a child transfers into our setting and safeguarding records are received, the DSL reviews the information and, where appropriate, shares relevant details with staff involved in supporting the child to ensure their welfare, safety and educational needs are met.
9. Ensuring that all records are created, stored, retained and disposed of in accordance with the school's Data Protection and Retention policy and relevant statutory requirements. Extended retention periods are applied to specific records, including Children Looked After records, and a record of secure disposal is maintained where appropriate.
10. Ensuring that they, or the staff member attending case conferences, core groups, Family Help meetings or other multi-agency planning meetings, contribute to assessments and provide a report which is also shared with the parents.
11. Ensuring that any child currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
12. Organising child protection training on induction and updating training every 3 years for all staff.
13. Providing the Headteacher with an annual report for the Governing Body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and the Governing Body; number and type of safeguarding incidents/cases, and number of children on the child protection register (anonymised).

14. Liaising with other agencies and professionals to coordinate support, share relevant information and promote the welfare, safety and educational outcomes of children.

The full responsibilities of the D/DSL are set out in their job description as well as outlined in relevant statutory guidance, such as Keeping Children Safe in Education 2026.

Supporting Children and Young People

In line with Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026, the school recognises the role of Family Help in providing support to children and families as soon as needs emerge. Family Help may include universal support, community-based early help, targeted early help and support delivered through statutory Child in Need arrangements. Staff will work collaboratively with safeguarding partners and other agencies to ensure children receive the right help at the right time.

We will consider the need for a Family Help assessment when low level concerns or emerging needs are identified. Detailed information on the Families First Partnership (FFP) programme can be found in the Families First Partnership (FFP) programme guide⁹ and is described in Chapter 3 of Working Together to Safeguard Children.

We recognise our responsibility to identify children and families who may benefit from Family Help and, where appropriate, we will initiate or contribute to a Family Help Assessment. The assessment identifies the strengths, needs and desired outcomes for the child and family and informs a Family Help Plan. This helps determine whether needs can be met through support within the setting or whether additional support from other agencies is required.

The views, wishes and experiences of the child and their parents/carers are central to the assessment and planning process, and families are encouraged to participate fully in developing and reviewing the plan. The Family Help process provides a structured approach to recording support, interventions and progress, and may support requests for additional services where a child's needs cannot be met by a single agency alone.

Regular Family Help Reviews are held to monitor progress, evaluate the effectiveness of support and agree any changes required to the plan. All professionals involved in the care of the child will be invited to attend. Reviews will normally take place every 4 to 6 weeks, or sooner where circumstances require.

⁹ [FFP Programme guide: delivery expectations for statutory safeguarding partners in England: year 2 \(2026 to 2027\)](#)

If at any point during the Family Help process led by the setting, the risk increases and we become concerned that the child is, or is likely to suffer significant harm, then a referral will be made to Children's Social Care.

In all cases we will consider the relevant statutory guidance, including Keeping Children Safe in Education (2026) with particular reference to Part 1: Information for all schools and colleges.

We will support all children and young people by:

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as our relationships, whilst not condoning aggression or bullying.
- Promoting healthy relationships.
- Promoting a caring, safe and positive environment within the setting.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Ensuring that, where there have been safeguarding concerns for a child leaving the setting, the child protection file and other relevant safeguarding information are copied under confidential cover and transferred securely and without delay to the receiving setting. The transfer of educational and health records will also be prioritised to support continuity of safeguarding, care and support.

If at any point we become concerned that a child is at **immediate** or **imminent** risk, we will contact Greater Manchester Police on either 101 or 999. If, however, we are concerned that a child is or is likely to suffer serious harm but it is not imminent we will call Wigan Children's Social Care Referral Team on 01942 828300.

Information sharing

We recognise that all matters relating to child protection are confidential and that information is handled in line with our Information Sharing and Data Protection policies and statutory safeguarding guidance, ensuring that information is shared appropriately where it is necessary to safeguard and promote the welfare of a child.

The Government has issued [Information Sharing for Safeguarding Practitioners](#) (May 2024). This guidance included the 7 'Golden Rules' for sharing information:

1. **All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. **When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).
3. **You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** 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 carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.
4. **Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.
5. **When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**
6. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.
7. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

All staff are aware that they have a professional responsibility to share information in order to safeguard our children and cannot assume that someone else will pass on the information.

Information is shared appropriately to safeguard and promote the welfare of our children, ensuring that it is accurate, up to date, shared promptly and provided only to those with a legitimate need to know.

Key organisations who have a duty under Section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:

- The local authority;
- NHS England;
- Integrated Care Systems;
- NHS Trusts, NHS Foundation Trusts;
- The local policing body;
- British Transport Police Authority;
- Prisons;
- National Probation Service and Community Rehabilitation Companies;⁴
- Youth offending teams; and
- Bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of Section 74 of the Education and Skills Act 2008.

We will always endeavour to share our intention to refer a child to Social Care with their parents / carers unless doing so could put the child at greater risk of harm, or impede a criminal investigation.

Supporting Staff

Willow Grove will work with partners in the safeguarding partnership to ensure positive outcomes for our children.

We recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

The D/DSL will make use of support available from the Local Authority and the Partnership's Safeguarding Team.

The DSL has oversight of Family Help and Child Protection plans and there is appropriate structure in place to monitor progress and outcomes in partnership with Children's Social Care and other stakeholders.

Training

All members of staff, Governors and volunteers have read, signed and understood the school's Staff Code of Conduct Policy (for safer working practice).

Induction

The welfare of all of our children is of paramount importance. All staff including volunteers, are informed of our safeguarding procedures, including online safety, at induction. Our induction also includes:

- Plan of support for individuals appropriate to the role for which they have been hired
- Confirmation of the conduct expected of staff within the schools – our Staff Code of Conduct Policy
- Opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities
- Confirmation of the line management / mentor process whereby any general concerns or issues about the person's ability or suitability will be addressed
- Safeguarding Training

Safeguarding training

This training is for all staff, including Governors, and is updated every 3 years as a minimum to ensure staff understand their role in safeguarding. Any member of staff not present at this whole staff session will receive this statutory training requirement on their return.

In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as necessary and at least annually. All staff also receive training in online safety, which includes the IT filtering and monitoring system, and this is updated as necessary.

Advanced training

The D/DSL have additional training which is updated every two years as a minimum. The D/DSL also attend multi-agency courses relevant to our setting's

needs. Their knowledge and skills are refreshed at least annually, e.g. via e-bulletins or safeguarding networking events with other D/DSLs.

Safer Recruitment

At least one person on any recruitment panel has undertaken Safer Recruitment Training. This training is updated in line with statutory requirements and best practice.

Keeping Children Safe in Education (2026) guidance to safer recruitment includes:

- The recruitment and selection process
- Pre appointment and vetting checks
- Other necessary checks
- How to ensure the ongoing safeguarding of children and legal responsibilities of employers

Preventing Radicalisation

All staff undertake Prevent Training during their induction and we have a Prevent risk assessment in place.

Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their role with a senior leader and to seek further support as appropriate.

The Governing Body

Governors have access to our Induction programme. However, they may choose to complete training provided by Wigan Council's Governor Service. In addition, Governors may choose to attend annual whole school safeguarding and child protection training.

Allegations against staff

All adults working with children should take care not to place themselves in a vulnerable position with a child.

All staff should have awareness and knowledge of guidance on supporting behaviour for learning along with our own Behaviour Policy and this is part of induction for all new staff or volunteers.

Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, is given at induction, alongside information on Safer Working Practices.

We understand that a child or parent/carer may make an allegation against a member of staff, a Governor or a volunteer at the setting.

If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher.

The Headteacher on all such occasions, will discuss the content of the allegation with the Local Authority Designated Officer (LADO).¹⁰

If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of the Governing Body who will consult the LADO, without notifying the Headteacher first.

We will follow Wigan's procedures for managing allegations against staff. Under no circumstances will we send a child home pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.

Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of Human Resources / Legal in order to make that decision, informing the LADO at the earliest opportunity.

In the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of the Governing Body with advice as outlined above.

We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

Disagreements, Escalation and Resolution

Effective working together depends on an open approach and honest relationships between staff, families and agencies supporting our children.

Staff are confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision to act / not act in response to a concern raised about a child is wrong. In such cases the WSCP Case Resolution Protocol (formerly escalation policy) is used if necessary.¹¹

¹⁰ LADO process can be found on the WSCP website [LADO - Wigan Safeguarding Children's Partnership](#)

We recognise that there may be occasions where parents disagree with decisions or actions that we have taken. In the first instance, concerns should be discussed with the relevant member of staff or the Headteacher. Where parents remain dissatisfied, they may raise their concerns through our Complaints Procedure, which is available on the setting's website or upon request.

Whistleblowing

All staff can raise concerns about poor or unsafe practice and potential failures in our safeguarding regime. Our whistleblowing procedures, which are reflected in staff training and our Code of Conduct, are in place for such concerns to be raised with Miss Glover (Headteacher).

If a staff member feels unable to raise an issue with the Headteacher or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline - Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email help@nspcc.org.uk.
- A member of the Governing Body: Mrs J Woods
chairofgovernors@willowgroveprimary.org.uk

We recognise that children cannot be expected to raise concerns in an environment where staff are unable to do so.

All staff are made aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitudes or actions of colleagues. If it becomes necessary to consult outside the school, they should speak, in the first instance, to the LADO following the whistleblowing policy.

Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Body whose contact details are readily available to staff, including on the Safeguarding notice board.

It's acknowledged that whistleblowers have the right to remain anonymous, however identifying themselves may assist with any further investigations.

Physical Intervention and Use of Reasonable Force

We acknowledge that staff must only ever use physical intervention as a last resort, when a child or young person is endangering themselves or others.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. "Reasonable"

in these circumstances means using no more force than necessary and staff should refer to the section on “use of reasonable force” within the behaviour policy.

Such events should be recorded by completing a serious incident log (on CPOMS) and signed by a witness.

Staff who are likely to need to use physical intervention or reasonable force will be appropriately trained in an accredited positive handling technique.

We understand that physical intervention of a nature which causes injury or distress to a child or young person may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff are aware of the safer working practice guidance¹² to ensure they are clear about their professional boundary.

Prevention

We recognise that we play a significant part in the prevention of harm to our children by providing them with good lines of communication with trusted adults.

If Targetted Family Help is appropriate, the D/DSL will contact the local authority to ensure there is no current intervention and will generally lead on liaising with other agencies, setting up an inter-agency assessment as appropriate.

Family Help means providing support as soon as concerns emerge, at any point in a child's life. Providing early intervention is more effective in promoting the welfare of children than reacting later.

Any such cases will be kept under regular review and consideration given to a referral to Children's Social Care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

We will;

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children, e.g. through safety questionnaires, participation in anti-bullying week, asking to report whether they have had happy / sad lunchtimes / playtimes / breaks.
- Ensure that all children know that there is a trusted adult available whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, and opportunities to equip children with the skills they need to stay safe from harm and to know whom they should turn to for help. This will include all

¹² [Home - Wigan Safeguarding Children's Partnership](#)

aspects of anti-bullying work, e-safety, road safety, pedestrian and cycle training. There will also be focused work in Year 6 to prepare for transition and develop personal safety / independent travel skills.

- Ensure all staff are aware of our guidance for the use of mobile phones and technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Children with Special Education Needs and Disabilities (SEND)

We will use the same considerations for children and young people with SEND, as detailed above. However, we also take into consideration that additional barriers can exist when recognising abuse and neglect for children with SEND. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's SEND without further exploration (we will consider the child first and foremost, rather than the child's SEND);
- A higher risk of vulnerability due to factors such as a learning disability, lack of awareness, social isolation, which may contribute to risks such as online vulnerability;
- Being more prone to peer group isolation than other children;
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Children and young people with SEND can face a number of challenges to disclosure, which are recognised and taken into account, including prejudice, negative responses and low expectations.

Children with Medical Conditions

*Supporting pupils at school with medical conditions*¹³ (December 2015) statutory guidance interprets a medical condition as any physical or mental health need that affects a pupil's ability to access education.

The school recognises that children with medical conditions are vulnerable and may require additional support to access education safely.

Staff recognise that self-harm, eating disorders, suicidal ideation and suicide risk may present as safeguarding concerns and should be reported to the DSL in line with this policy.

¹³ [Supporting pupils at school with medical conditions](#)

A medical condition in itself does not automatically constitute a safeguarding concern. However, staff will remain vigilant where:

- a child's medical needs are not being met;
- there are concerns regarding neglect of medical needs;
- a medical incident raises safeguarding concerns;
- a child's health condition places them at increased vulnerability.

The D/DSL will work collaboratively with health professionals and other partners where safeguarding concerns arise in relation to a child's medical condition to ensure appropriate support is provided.

Domestic Abuse

We recognise the significant impact domestic abuse can have on children, therefore we operate in partnership with Operation Encompass¹⁴, a system which facilitates the sharing of information relating to domestic incidents where children live or frequent. Any incidents of domestic violence reported to the police will be notified to the registered school to effectively support the child(ren).

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Sexual Violence and Sexual Harassment including Child-On-Child

We recognise that allegations of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made.

Decisions will be made on an individual basis with the DSL taking a leading role, supported by other agencies such as Children's Social Care and the Police, as required¹⁵.

¹⁴ [Home : Operation Encompass](#)

Child-On-Child abuse

All children have a right to attend school and learn in a safe environment. All child-on-child abuse is unacceptable and will be taken seriously. Child-on-child abuse is not tolerated, passed off as “banter” or seen as “part of growing up”. It is likely to include, but not limited to:

- bullying (including cyber bullying)
- gender based violence
- sexual assaults
- consensual and non-consensual intimate images and/or videos or
- Initiation / hazing type violence and rituals
- Abuse in intimate personal relationships between peers

Consequently, child-on-child abuse is dealt with as a safeguarding concern, recorded as such and not managed through the systems set out in the school behaviour policy.

Victims, perpetrators and any other child affected by child-on-child abuse will be supported through the school’s pastoral system and the support will be regularly reviewed.

We minimise the risk of child-on-child abuse by providing:

- A relevant curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe.
- Established / publicised systems for children to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.

The D/DSL liaises with other professionals to develop robust risk assessments and appropriate specialist targeted work for children that are identified as posing a potential risk to other children.

Child-on-child abuse may occur both online and offline and may include the use of technology to facilitate abuse. This includes the consensual and non-consensual sharing of intimate images or videos, including AI-generated imagery and deepfakes.

The school recognises the harmful impact of misogyny, misandry, sexual harassment, sexual violence and harmful sexual behaviour and does not tolerate abusive behaviour of this nature. The school will take all reported incidents seriously and will not tolerate, normalise or minimise behaviour of this nature.

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under

child protection procedures. This includes all forms, e.g. cyber, racist, homophobic and gender related bullying.

All staff are aware that children with SEND and / or differences / perceived differences are more susceptible to being bullied / victims of child abuse.

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

We keep a record of known bullying incidents and will keep a record of racist and sexual incidents.

Upskirting

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

In the event of any reported upskirting, staff will follow safeguarding procedures and report to the D/DSL.

Online Safety

We recognise that online safety is a safeguarding and child protection issue.

Children routinely access the internet, social media, online gaming platforms, messaging services and digital technologies as part of their daily lives. While these technologies provide many educational and social benefits, they may also expose children to safeguarding risks including cyberbullying, child-on-child abuse, online grooming, child sexual exploitation, criminal exploitation, radicalisation, misinformation, harmful content, coercion, and risks associated with sharing personal information and images online.

We adopt a whole-school approach to online safety and work to ensure that children are taught how to keep themselves safe online, whilst staff remain vigilant to indicators of online harm and take appropriate action in response to safeguarding concerns. We have appropriate filtering and monitoring systems in place to help safeguard pupils when accessing technology, and regularly review these arrangements to ensure they remain effective, proportionate and appropriate to our context.

We recognise the increasing use of Generative Artificial Intelligence (AI) by children and young people. Staff understand that AI may present safeguarding risks including:

- AI-generated sexualised images and deepfakes
- exposure to harmful content
- misinformation and disinformation
- online grooming and exploitation
- cyberbullying and harassment

Safeguarding concerns involving AI-generated content will be treated in the same way as any other safeguarding concern and managed in accordance with this policy.

The school operates in accordance with its Mobile Phone policy and seeks to minimise risks associated with personal mobile devices during the school day. Mobile device arrangements support the school's safeguarding and behaviour expectations.

Preventing Radicalisation

Protecting children from the risk of radicalisation is seen as part of our wider safeguarding duties.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. As with managing other safeguarding risks, staff are alert to changes in children's behaviour that could indicate that they are in need of protection. Staff use their professional judgement in identifying children and young people who might be at risk of radicalisation and act proportionately which may include making a Prevent referral to the Channel programme.

This policy is therefore written to comply with the schools' duty under Section 26 of the Counter Terrorism and Security Act 2015 in accordance with the Department of Education advice for schools' specific guidance for schools.

Exploitation – Child Sexual Exploitation (CSE), Criminal, Human Trafficking, Modern Day Slavery, County Lines

We will ensure that the D/DSL and other key staff are trained in spotting the possible signs of exploitation outlined in **Appendices 1 and 2** (this is not an exhaustive or definitive list).

Female Genital Mutilation

The Female Genital Mutilation Act 2003 was amended by the Serious Crime Act 2015 where the law was extended to:

- A non-UK national who is 'habitually resident' in the UK and commits such an offence abroad can now face a maximum penalty of 14 years imprisonment. It is also an offence to assist a non-UK resident to carry out FGM overseas on a girl who is habitually, rather than pertinently, resident in the UK. This follows a number of cases where victims were unable to get justice as FGM was committed by those not permanently residing in the UK.
- A new offence is created of failing to protect a girl from the risk of FGM. Anyone convicted can face imprisonment for up to seven years and / or and unlimited fine.
- Anonymity for the victims of FGM. Anyone identifying a victim can be subject to an unlimited fine.

We recognise and adhere to our legal duty to report any suspected or known cases of FGM about a female under 18 years old to the Police.

Our D/DSL will maintain up to date knowledge of the Greater Manchester Safeguarding Partnership Protocol to Female Genital Mutilation¹⁶.

Children Missing Education

We recognise that repeated absence, prolonged absence, severe absence, part-time timetables and missing education can be indicators of neglect, child criminal exploitation, child sexual exploitation, mental health concerns or other safeguarding risks.

Attendance concerns will therefore be considered through a safeguarding lens and reviewed alongside wider vulnerability indicators. Where appropriate, Family Help assessments and Children's Social Care referrals will be considered.

Responsibilities for Children Missing from Education (CME):

- Education settings must enter pupils on the admission register at the beginning of the first day on which the setting has agreed, or been notified, that the pupil will attend. If a pupil fails to attend on the agreed or notified date, the education setting should undertake reasonable enquiries

¹⁶ [Female Genital Mutilation Multi-Agency Protocol](#)

to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.

- Education settings must monitor pupils' attendance through their daily register and inform local authorities of the details of pupils who fail to attend regularly or have missed ten school days or more without permission. Education settings should monitor attendance closely and address poor or irregular attendance.
- Education settings should ensure that appropriate work is provided for pupils during the first five school days of any suspension. From the sixth school day of suspension, the education setting must arrange for the child to receive their education in settings which are not subject to a national registration scheme or inspection framework, such as alternative provision (AP). In cases of permanent exclusion, the Local Authority has a duty to arrange suitable full-time education from the sixth school day following the exclusion. Further information can be found in the Suspension and Permanent Exclusion statutory guidance.
- Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. Further information about schools' safeguarding responsibilities can be found in the Keeping Children Safe in Education.

Making reasonable enquiries for Children Missing Education;

- The term 'reasonable enquiries' grants education settings and local authorities a degree of flexibility in decision-making, particularly as the steps that need to be taken in a given case will vary. The term 'reasonable' also makes clear that there is a limit to what the education setting and local authority is expected to do.
- In line with the duty under Section 10 of the Children Act 2004, the expectation is that the education setting and the local authority will have in place procedures designed to carry out reasonable enquiries. The type of procedures may include the appropriate person checking with relatives, neighbours, landlords – private or social housing providers – and other local stakeholders who are involved. They should also record that they have completed these procedures. If there is reason to believe a child is in immediate danger or at risk of harm, a referral should be made to children's social care (and the police if appropriate).

Staff report immediately to the D/DSL, if they know of any child who may be:

- Missing – whereabouts unknown and unable to make contact (as a result of making reasonable enquiries)
- Missing education (CME) refers to children of compulsory school age who are not registered at a school and are not receiving suitable full-time education otherwise than at school.

The local authority requires education settings to complete the 'Children Missing Education' referral form where there are concerns that a child may be missing education and initial reasonable enquiries have failed to establish the child's whereabouts.

Submission of a CME referral does not conclude the education setting's responsibilities. They must continue to make reasonable enquiries to establish the child's whereabouts, share any new information obtained and work collaboratively with the local authority throughout the enquiry process.

Upon receipt of the referral, the CME Team will undertake further enquiries and checks using available local authority systems, partner agencies and other appropriate sources of information. The school and local authority will work jointly to conduct reasonable enquiries and establish the child's whereabouts and educational provision.

Joint enquiries must be concluded before a pupil can be removed from a school roll under the relevant provisions of the School Attendance (Pupil Registration) (England) Regulations 2024. A pupil must not be removed from the admission register until the school and local authority have completed and exhausted all reasonable lines of enquiry and the statutory requirements for deletion have been met. The responsibility for removing a pupil from roll remains with the school in accordance with the Regulations.

Making these enquiries may not always lead to establishing the location of the child but will determine what action should be taken next, for example, to contact the police, Children's Social Care and, in cases where there may be concerns for the safety of a child who has travelled abroad, the Foreign and Commonwealth Office.

Where a pupil has not returned to school within ten school days of an authorised absence, or has been absent from school without authorisation for twenty consecutive school days, their name may only be deleted from the admission register under Regulation 9(1)(h) or (i) of the School Attendance (Pupil Registration) (England) Regulations 2024 where both the school and the local authority have failed to establish the pupil's whereabouts after jointly undertaking reasonable enquiries.

A pupil must not be removed from the admission register until these joint enquiries have been concluded and the statutory requirements for deletion have been met. This only applies where the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or another unavoidable cause.

The Designated Teacher for **CLA and care leavers** will discuss any unauthorised / unexplained absence of a Looked After Children with the Virtual School Team, when required.

Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised / unexplained absence, and after reasonable attempts have been made to contact the family, the DSL follows the WSCP procedure and refers to Children's Services as appropriate.

Where there are no known welfare concerns about a pupil, we will follow procedures outlined in Working Together to Improve School Attendance 2026¹⁷. Should a pupil's attendance become a cause for concern, we will intervene early to prevent entrenched non-school attendance, initiating a Family Help assessment, if appropriate. This will evidence and identify the barriers impacting on the pupil's engagement with school.

Elective Home Education

We notify the Local Authority where a parent wishes to withdraw their child from school for the purpose of Elective Home Education (EHE). Prior to removing a pupil from roll, we will complete the Local Authority's EHE referral form. From September 2026, all EHE notifications will be submitted using the Local Authority's online EHE referral process.

Parents have a right to educate their children at home. Section 7 of the Education Act 1996 provides that:

"The parent of every child of compulsory school age shall cause him to receive efficient full-time education suitable:

(a) to his age, ability and aptitude, and

(b) to any special educational needs he may have,

either by regular attendance at school or otherwise."

Where a parent wishes to withdraw their child from school for EHE, they must notify the school in writing. The written notification must clearly confirm the parent's intention to assume responsibility for their child's education and **must** include the date from which EHE will commence. Parents may provide a future date for withdrawal, for example at the end of a term or school year, and a decision to home educate and, in these circumstances, does not need to take effect immediately upon notification.

Upon receipt of the parent's written notification, we will submit the Wigan EHE referral form without delay. The referral will include a copy of the parent's written notification and the intended date of withdrawal. Where a future withdrawal date has been provided, the pupil will remain on roll and continue to attend school in the usual manner until the agreed date of deregistration.

We will not remove a pupil from roll until the written notification has been received from the parent and the EHE referral has been submitted to the Local Authority including a copy of the parent's written request.

We will ensure that parents are provided with a copy of the Wigan EHE Policy and are made fully aware that they assume full responsibility for arranging and funding a suitable full-time education from the first day of EHE. There is no

¹⁷ [Working together to improve school attendance: July 2026](#)

financial or resource support available from the Local Authority to support the delivery of home education.

When a parent informs us of their intention to EHE, the Department for Education recommends that we offer an opportunity to discuss the decision with the parent to ensure they are making an informed choice and understand the responsibilities associated with EHE. Wigan Council recommends that this discussion is undertaken by a member of the Senior Leadership Team, DSL, SENCO or Inclusion Lead, as appropriate. The purpose of the discussion is to ensure parents understand the responsibilities associated with EHE, consider any alternative support available and explore whether any identified barriers to attendance or engagement can be addressed.

Children with an Education, Health and Care Plan (EHCP)

An EHCP review will be scheduled when we become aware that a parent is contemplating Elective Home Education. This can provide an opportunity for the child, family, school and professionals to discuss any concerns, review current support arrangements and consider whether additional provision or amendments to the Plan could enable the child to remain in school. Parents should not feel that Elective Home Education is their only option where challenges are being experienced within the educational placement.

Special schools (Willow Grove)

Where a child attends a special school named within their EHCP, different legal arrangements apply for EHE. Parents who wish to electively home educate must still provide written notification to the school and the school must submit an EHE referral to the Local Authority along with a copy of the parent's written request. However, the school must not remove the pupil from roll until consent has been obtained from the Local Authority. The child may not attend as parent is home educating but the provision must be reviewed by the Local Authority.

Special School Settings will also inform the SEND Team via email SENDSAdmin@wigan.gov.uk who will consider the request in consultation with the Elective Home Education Team and any other relevant professionals. This process will be undertaken without unnecessary delay and will consider the child's individual circumstances, the suitability of the proposed educational arrangements and the Local Authority's ongoing duties in relation to the EHCP. The child will remain on roll at the special school until formal agreement has been provided by the Local Authority and the school has been notified that the pupil may be removed from roll.

Elective Home Education is not a mechanism to secure a transfer to another school. Where a parent elects to EHE and subsequently wishes their child to return to school, there is no automatic entitlement to a place at an alternative school. In Wigan, where a child returns from EHE, the expectation is that the child will return to their previous school unless an alternative place becomes available through the normal admissions process.

The Local Authority EHE Team monitors all withdrawals to EHE and records the reasons provided by families during initial contact. This information is used to understand the characteristics of the local EHE cohort, identify emerging themes

and trends, support strategic planning and monitor patterns of withdrawal across schools and settings. We will therefore ensure that the reasons recorded on the EHE referral are accurate, evidence-based and reflective of the individual circumstances of the child and family. This information is also used for local analysis and statutory returns.

For general guidance the EHE Team can be reached at ehe@wigan.gov.uk. Please note that referrals cannot be emailed in and must be completed online.

Off Rolling and Removal from Roll

We ensure that all additions to and deletions from the admission register comply with the School Attendance (Pupil Registration) (England) Regulations 2024 and the statutory guidance *Working Together to Improve School Attendance*. The responsibility for maintaining the admission register and determining whether a lawful ground exists for removing a pupil from roll rests with the Headteacher. Schools must not remove a pupil from the admission register unless one of the prescribed legal grounds for deletion has been met.

Removing a pupil from roll where a lawful ground does not exist, encouraging a parent to remove their child from school in the interests of the school rather than the child, retrospectively deleting a pupil from roll, or failing to follow statutory processes may constitute off-rolling.

Schools **must not** suggest, encourage, influence or pressure parents to electively home educate their child as a means of addressing attendance, behaviour, attainment, exclusion, special educational needs, medical needs, safeguarding concerns or any other challenges being experienced by the school or pupil. The decision to electively home educate must always be an informed and voluntary decision made solely by the parent. Where concerns exist, we will work collaboratively with the child, family and relevant professionals to identify and implement appropriate support. We understand that encouraging a parent to withdraw their child from school for Elective Home Education in the interests of the school, rather than the child, may constitute off-rolling.

Schools **are required** to notify the Local Authority **of all** deletions from the admission register, except at normal transition points, such as:

- Transfer from Year 6 to Year 7 through the normal admissions process.
- The end of compulsory school age at the end of Year 11.

For all other removals from roll, schools **must** ensure the Local Authority is notified using the appropriate process using the appropriate form:

- **Elective Home Education (EHE) Referral** where a parent has chosen to home educate.
- **Children Missing Education (CME) Referral** where a pupil's whereabouts are unknown and joint reasonable enquiries are required.

- **Off-Roll Notification Form** for all other lawful deletion grounds.

We will provide all information required by the Local Authority to support statutory duties, pupil tracking and destination monitoring.

The Local Authority undertakes regular off-roll monitoring to ensure that deletions from the admission register comply with legislation and statutory guidance. We will not backdate removal dates under any circumstances. A pupil's name will only be deleted from the admission register on the date that the legal ground for deletion is met. We understand that retrospective deletions are not permitted and may be considered a form of off-rolling.

Where a deletion ground requires reasonable enquiries to be undertaken, including Children Missing Education cases, we will continue to work collaboratively with the Local Authority until all enquiries have been concluded and the statutory requirements for deletion have been fully met. A pupil will not be removed from roll before these requirements have been satisfied.

Further information regarding admission registers, removal from roll, notification requirements and off-rolling can be found within the Department for Education's statutory guidance Working Together to Improve School Attendance and the Wigan Local Authority Children Missing Education Policy.

Young Carers

A Young Carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled or misuses drugs or alcohol.

We recognise the impact that being a Young Carer can have on pupils, , including their attendance, attainment, behaviour and wellbeing, and the importance of early identification of those young people so that appropriate support can be provided at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Where one of our children is identified as having additional support needs due to being a Young Carer, or where a multi-agency approach may be required, our school uses the Family Help Framework and routes into the Wigan and Leigh Carers Centre.

Social Transition

We acknowledge that some children may wish to discuss aspects of their gender identity and how they would like to be supported with this. Such matters will be approached sensitively, respectfully and on an individual basis, and decision-making will be made in accordance with safeguarding duties and statutory guidance.

Any requests relating to social transition will be considered on an individual basis following a written request to the school by the child or their parents/carers. This request must be addressed to the Headteacher in order to be formally considered.

Parents/carers will normally be involved, and their views will carry significant weight unless there is reason to believe involvement would place the child at risk of harm. In such circumstances, the D/DSL will determine the appropriate safeguarding response.

We will take a careful and considered approach, maintaining appropriate records and seeking advice from relevant professionals, where required.

Where a child chooses to discuss their feelings with a member of staff but does not request any change to how they are treated in school, staff will respect confidentiality unless a safeguarding concern is identified.

Monitoring and Evaluation

Our child protection policy and procedures will be monitored and updated by:

- Governing Body visits to the education setting
- SLT drop ins and discussions with children, young people and staff
- Pupil surveys and questionnaires
- Scrutiny of exclusion and attendance data
- Scrutiny of minutes
- Logs of bullying / racist / sexist behaviour incidents for SLT and GB to monitor
- Review of parental concerns and parent / carer questionnaires
- Review of the use of intervention strategies such as nurture room and isolation room.

This policy should be read in alongside the following policies and documents relevant to the safety and welfare of our pupils;

- Acceptable use of IT
- Accessibility Plan
- Anti-bullying
- Anti-fraud, bribery and corruption
- Attendance
- Behaviour for Learning
- Child-on-child abuse
- CME
- Data Protection & Retention
- EHE
- Equality
- First Aid
- Health & Safety
- IT Filtering & Monitoring.
- Lockdown procedures
- Mental Health & Wellbeing
- Online/E Safety
- Mobile Phone & Electronic Devices
- Positive Handling
- Provider Access
- Mobile Phone & Electronic Devices
- Positive Handling
- Provider Access
- Relationships & Sex Education
- Safer Recruitment
- School Trips
- Searching, screening and confiscation
- Social Media
- Supporting Pupils with Medical Conditions
- Whistleblowing

Glossary

A Child	A person who has not yet reached their 18 th birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Bullying & Cyberbullying	Behaviour that is: • repeated • intended to hurt someone either physically or emotionally • often aimed at certain groups, for example because of race, religion, gender or sexual orientation
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation (CSE)	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	SEN – a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability – a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Child-on-child Abuse	Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18.
County Lines	Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across

	counties, and they use dedicated mobile phone 'lines' to supply drugs
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.
Criminal Exploitation	Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • psychological • physical • sexual • financial • emotional
Family Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.
Elective Home Education (EHE)	When a parent exercises their right to provide their child's education via an alternative to school. This involves the parent working in partnership with the local authority to support the authority meeting their duty to ensure the education is efficient and suitable. In this case the safeguarding duty for the child rests with the parent or guardian. Although safeguarding concerns from schools and professional would continue as with any other case and should follow safeguarding referral routes into the MAST for triage and assessment
Emotional Abuse	The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they

	are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	Defining a gang is difficult. They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang. A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).
Hate	Hostility or prejudice based on one of the following things: • disability • race • religion • transgender identity

	• sexual orientation.
Homelessness	The definition of homelessness means not having a home. You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head. You count as homeless if you are: • staying with friends or family; • staying in a hostel, night shelter or B&B; • squatting (because you have no legal right to stay); • at risk of violence or abuse in your home; • living in poor conditions that affect your health; • living apart from your family because you don't have a place to live together. https://safeguarding.network/safeguarding-resources/parental-issues/homelessness/ https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
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: • 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.
Modern Slavery	Modern slavery is a serious crime being committed across the UK in which victims are exploited for someone else's gain. It can take many forms including trafficking of people, forced labour and servitude. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.

Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	• protecting children from maltreatment; • preventing impairment of children's health or development; • ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
Intimate images	Sharing consensual and non-consensual intimate images and/or videos is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages.

	• They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.
Sexual Abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape, oral sex or other forms of penetration offences as defined by the Sexual Offences Act 2003) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children
Sexual harassment	Is a type of harassment involving the use of explicit or implicit sexual overtones, including the unwelcome or inappropriate promise of rewards in exchange for sexual favours. Sexual harassment includes a range of actions from verbal transgressions to sexual abuse or assault
Sexual Violence	Is the general term we use to describe any kind of unwanted sexual act or activity, including rape, sexual assault, sexual abuse and other forms of penetration and non-penetration offences as defined by the Sexual Offences Act 2003.
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.

Upskirting	Upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
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Appendix 1

Recognising signs of child abuse

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- ✦ Significant change in behaviour
- ✦ Extreme anger or sadness
- ✦ Aggressive and attention-seeking behaviour
- ✦ Suspicious bruises with unsatisfactory explanations
- ✦ Lack of self-esteem
- ✦ Self-injury
- ✦ Depression
- ✦ Age inappropriate sexual behaviour
- ✦ Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- ❖ An explanation which is inconsistent with an injury
- ❖ Several different explanations provided for an injury
- ❖ Unexplained delay in seeking treatment
- ❖ The parents/carers are uninterested or undisturbed by an accident or injury
- ❖ Parents are absent without good reason when their child is presented for treatment
- ❖ Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- ❖ Family use of different doctors and A&E departments
- ❖ Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- ❖ Any bruising to a pre-crawling or pre-walking baby
- ❖ Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- ❖ Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- ❖ Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- ❖ Variation in colour possibly indicating injuries caused at different times
- ❖ The outline of an object used e.g. belt marks, handprints or a hairbrush
- ❖ Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- ❖ Bruising around the face
- ❖ Grasp marks on small children

- ❖ Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- ❖ Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- ❖ Linear burns from hot metal rods or electrical fire elements
- ❖ Burns of uniform depth over a large area
- ❖ Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- ❖ Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- ❖ The history provided is vague, non-existent or inconsistent with the fracture type
- ❖ There are associated old fractures
- ❖ Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- ❖ There is an unexplained fracture in the first year of life

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and Lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- ❖ Inappropriate sexualised conduct
- ❖ Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- ❖ Continual and inappropriate or excessive masturbation
- ❖ Self-harm (including eating disorder), self-mutilation and suicide attempts
- ❖ Involvement in prostitution or indiscriminate choice of sexual partners
- ❖ An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- ❖ Pain or itching of genital area
- ❖ Blood on underclothes
- ❖ Pregnancy in a younger girl where the identity of the father is not disclosed
- ❖ Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society's standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses

that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Child Sexual Exploitation (CSE)

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults

- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Child Criminal Exploitation (CCE)/ County Lines

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of Criminal Exploitation / County Lines

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly disheveled
- Having hotel cards or keys to unknown places.

Appendix 2

Forced Marriage (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African

communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)

- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay**.

Appendix 3

Operation Encompass Teachers' Helpline

Details of the Operation Encompass Helpline can be found here –
<https://www.operationencompass.org/>

If you wish to speak to an educational/child psychologist following an Encompass referral you are now able to contact the Operation Encompass Teachers' National Helpline, 8.00am to 11.00am, Monday to Friday on 0845 646 0890

Online key adult training
<https://www.operationencompass.org/operation-encompass-on-line-key-adult-briefing>

Appendix 4

Hindley Campus, Leyland Park House, Park Road, Hindley, Wigan WN2 3RX.
Warrington Campus, 28 Warrington Road, Warrington, Wigan, WN1 3JR

T: 01942 553750 E: hindleyoffice@taqa.net



August 2028

Dear Colleague

Safeguarding and Safer Recruitment: Letter of Assurance

We confirm that as an Ofsted registered provider and just as in other publicly funded schools and in accordance with the requirements of the DfE guidance **Keeping Children Safe in Education (KCSIE 2026)** [Keeping children safe in education - GOV.UK](#) and the [Disqualification under the Childcare Act 2006 - GOV.UK \(www.gov.uk\)](#) Three Towers AP Academy has undertaken all the necessary safeguarding, safer recruitment, vetting and barring checks for all employees. This includes enhanced DBS Disclosures for eligible roles undertaking Regulated Activity.

It is a mandatory requirement that all staff undertake Level 2 Safeguarding training, which is updated annually. Our Designated Safeguarding Lead and the designated deputy leads all undertake Level 3 child protection training which is updated every two years with refresher training annually.

All staff have read and understand KCSIE part 1 and are aware of their responsibilities set out in [Working together to safeguard children 2026: a guide to multi-agency working to help, protect and promote the welfare of children](#) and [Working together to improve school attendance - GOV.UK \(www.gov.uk\)](#)

We also confirm that all Three Towers staff have read and will comply with The Rowan Learning Trust's Code of Conduct.

Finally, in accordance with the requirements of the DfE guidance Keeping Children Safe in Education, we can confirm that Three Towers maintains our own single central record and obtains appropriate risk assessments, insurance certification and safeguarding assurances from vocational providers.

Yours faithfully

Miss A. Isherwood
Headteacher

Mr P Rimmer
CEO The Rowan Learning Trust

Appendix 5 – to be updated and issued to schools directly in September 2026 via the Your HR mailbox



To: All Schools and Academies

Our reference: HRES
Your reference:
Please ask for: HR Employment Services
Extension: 2333
Direct line: 01942 827333
Date: 04 September 2025, reissued 11 January 2026

Dear Colleague

DBS Checks for School Visitors

I write to confirm the situation regarding safeguarding checks for Wigan Council employees who visit and work in schools and settings.

I can confirm that any visitor who is employed directly by Wigan Council will have had their post assessed for eligibility for a DBS check along with other pre-employment checks, including an assessment of the work they do directly in schools and settings.

I can therefore confirm that council employees whose post requires a DBS check would not have been employed without an acceptable clearance being received. Therefore, if your visitor is a current Wigan Council employee you can be assured that they have received the appropriate clearances, which may include a DBS check (role dependant) in line with the national safeguarding guidance and this letter will provide the evidence you will require for your records. You should of course check their Wigan Council badge to confirm their identity.

I hope you find this advice useful. If you have any questions or wish to clarify any areas, please contact me. As lead counter signatory, I am available to provide advice on any DBS issues you may have.

Yours sincerely,

Alison Hibbert
Lead Counter Signatory

Please reply to: HR Employment Services
Phone: 01942 827333
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