



Safeguarding and Child Protection Policy

Review cycle: Annually

Last Review Date: September 2026

Next Review Date: September 2027

Staff responsible: Designated Safeguarding Lead (DSL)

Governor/Committee responsible: Katy Morgan; Pastoral Committee

(This policy applies to the whole School including EYFS)



Terminology

Safeguarding and promoting the welfare of pupils is defined as:

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

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific pupils who are suffering, or are likely to suffer, significant harm.

Early Help means providing support as soon as additional needs and support emerge at any point in a pupil's life (This may be through universal services, such as schools and health services, or through Merton's targeted Family Help service where additional multi-agency support is required. Willington will work with families and partner agencies to ensure children receive the right help at the earliest opportunity.)

Staff refers to all those working for or on behalf of Willington, full or part time, trainee teachers, temporary or permanent, in either a paid or voluntary capacity.

Child/Pupil includes everyone under the age of 18 and applies to pupils at our school; however the policy will extend to visiting pupils from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, e.g. step-parents, foster carers, adoptive parents and those adults caring for pupils with a Special Guardianship Order.

Social Care refers to Children's Services in the area in which the pupil is resident, unless a pupil is a Child Looked After then this will be the Children's Services in their home authority.

Pupils and families hub refers to the Multi Agency Safeguarding Hub and Children's Consultation Line.

Nudes and Semi-Nudes refers to the creation, possession or sharing of nude or semi-nude images and/or videos of children under the age of 18. These incidents may occur online or offline and may be shared consensually or non-consensually.

Key Personnel

Designated Safeguarding Lead (DSL) is: Eleanor Henery
Contact details: eleanor.henery@willingtonschool.co.uk

Deputy DSL(s) are: Ruth Henson
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Deputy DSL(s) are: Keith Brown
Contact details: keith.brown@willingtonschool.co.uk

Deputy DSL(s) are: Natalie Fox



Contact details: natalie.fox@willingtonschool.co.uk

The nominated safeguarding governor is: Katy Morgan

Contact details: katy.morgan@willingtonschool.co.uk

The Headteacher is: Keith Brown

Contact details: keith.brown@willingtonschool.co.uk

The acting Chair of Governors: Faith Pengelly

Contact details: chairofgovernors@willingtonschool.co.uk

The Local Authority Designated Officer (LADO) is: Mr John Shelley

Contact details: John.Shelley@merton.gov.uk, Tel: 020 8545 3187

The Local Authority Multi Agency Safeguarding Hub:

Contact details: candfhub@merton.gov.uk, Tel: 0208 545 4226

Website: <https://www.mertonscp.org.uk/>

Safeguarding Statement 2026

“It could happen here”

At Willington Prep School we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.

We make every effort to provide an environment in which pupils and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that pupils receive effective support, protection and justice. Child protection forms part of Willington’s safeguarding responsibilities. We expect all staff, governors and volunteers to share this commitment to safeguarding our pupils.

We follow the Merton Children’s Safeguarding Partnership procedures and have several policies and procedures in place which contribute to our safeguarding commitment, including our Child Protection & Safeguarding Policy. A copy of this policy is available on the school website.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep pupils safe and secure in our school. The policy also informs parents and carers how we will safeguard their pupils whilst they are in our care.

Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: ‘Working Together to Safeguard Children’ 2023, Revised Safeguarding Statutory Guidance 2 ‘Framework for the Assessment of Children in Need and their Families’ 2000.

The policy also reflects, both statutory guidance ‘Keeping Children Safe in Education’ 2026 (KCSIE), and [Merton Children’s Safeguarding Partnership \(MCSP\) Procedures](#).



This policy is also based on the Education and Training (Welfare of Children) Act 2021, which places a duty on the school to safeguard and promote the welfare of pupils.

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of pupils; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those pupils who are suffering harm.

This policy applies to all members of staff and governors at Willington.

Guidance and documents referred to in this policy

[Working Together to Safeguard Children \(2023\)](#)

[Keeping Children Safe in Education 2026 \(KCSIE\)](#)

[Disqualification under the Childcare Act 2006 \(updated 2018\)](#)

[FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated 2020\)](#)

[Teacher Standards 2011 \(updated 2021\)](#)

[Information Sharing Advice for Practitioners' guidance 2018](#)

[The Equality Act 2010](#)

[The Human Rights Act 1998](#)

[Revised Prevent Duty Guidance for England and Wales 6th March 2024](#)

[Relationships Education, Relationships and Sex Education and Health Education 2025](#)

[The Crime and Policing Act 2026](#)

[Data \(Use and Access\) 2025](#)

[DfE Cyber Security Standards for Schools and Colleges](#)

[DfE Generative AI: product safety expectations guidance](#)



Policy Principles & Values

The welfare of the pupil is paramount.

Maintain an attitude of “It could happen here”.

Pupils have a right to feel safe and secure, they cannot learn effectively unless they do so.

All pupils have a right to be protected from harm and abuse.

All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a pupil is at risk of harm, either in Willington or in the community, taking into account risks outside of the home, in accordance with statutory guidance.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between pupils outside of school. All staff, but especially the DSLs will consider whether pupils are at risk of abuse or exploitation in situations outside of their families, recognising that extra-familial harms include, but are not limited to, sexual exploitation, criminal exploitation, and serious youth violence.

We acknowledge that working in partnership with other agencies protects pupils and reduces risk and so we will engage in partnership working to protect and safeguard pupils.

Whilst Willington will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the pupil’s best interests.

Policy Aims

To demonstrate Willington’s commitment about safeguarding and child protection to pupils, parents and other partners.

To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard pupils through identifying and reporting possible cases of abuse.

To enable Willington to effectively contribute to Early Help, assessments of need and support for those pupils.

To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.

To ensure that all staff working within our school who have substantial access to pupils have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory enhanced DBS check (according to KCSIE guidance), and a Single Central Record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in February 2015.

Supporting Pupils

We recognise that school may provide a safe place and the only stability in the lives of pupils who have been abused or who are at risk of harm.



We recognise that a pupil who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a pupil in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will support all pupils:

We will promote a caring, safe and positive environment within Willington.

We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.

We will ensure pupils are taught to understand and manage risk through Relationships and Sex Education (RSE) and through all aspects of school life. This includes online safety and anti-bullying, road safety, pedestrian and cycle training. As well as focussed work in Year 6 to prepare for transition to secondary school and more personal safety/independent travel.

We will respond sympathetically to any requests for time out to deal with distress and anxiety.

We will offer details of helplines, counselling or other avenues of external support.

We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of pupils.

We will notify Social Care immediately if there is a significant concern.

We will provide continuing support to a pupil about whom there have been concerns who leaves Willington by ensuring that information is shared under confidential cover to the pupil's new setting within 5 days and ensure the school medical records are forwarded as a matter of priority.

We will encourage the use of strategies to encourage pupils to share concerns as well as access to pastoral support. Pupils know who they can talk to if they do not feel safe.

We will reassure all pupils who are victims of abuse that they will be taken seriously and will be supported. They should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

We will ensure that following any safeguarding concern the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide.

We recognise that some pupils are at greater risk of harm than others, both online and offline.

Residential Visits and Overnight Accommodation

Although Willington is a day school and does not provide boarding accommodation, the School may organise residential visits and other overnight educational activities. For any such provision, safeguarding arrangements will reflect the expectations set out in Keeping Children Safe in Education 2026. Residential visits will be planned and risk assessed in accordance with the School's Educational Visits/Residential Visits Policy, with appropriate safeguarding, supervision, staffing, safer recruitment and pupil welfare arrangements in place throughout.



Young Carers

Willington recognises that some pupils may be young carers and that caring responsibilities can have a significant impact on a pupil's attendance, attainment, behaviour, emotional wellbeing and wider school experience. Staff will be alert to indicators that a pupil may be a young carer and will seek to identify and support young carers at the earliest opportunity. Where appropriate, the School will work in partnership with parents, carers, the local authority, health services and other relevant agencies to ensure that young carers receive appropriate support, including consideration of Early Help or Family Help where required.

Prevention / Protection

We recognise that Willington plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.

Willington will:

- Establish and maintain an ethos where pupils feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultation with pupils e.g. through questionnaires, participation in anti-bullying activities, asking pupils to report whether they have had happy/sad lunchtimes/playtimes
- Ensure that all pupils know there is and can access an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including opportunities which equip pupils with the skills they need to stay safe from harm and to know to whom they should turn for help.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Safe School, Safe Staff

We will ensure that:

Willington operates safer recruitment procedures that includes statutory checks on staff suitability to work with pupils. Disqualification under the Childcare Act 2006 still applies to staff themselves. All staff have a responsibility to inform the school where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of pupils in Willington. An enhanced DBS check is carried out for all new employees, staff have a responsibility to inform the Headteacher if their circumstances change whilst employed at Willington. This statement is in the Staff Behaviour Policy, which all staff have signed and agreed to adhere to.

We will not accept a Curriculum Vitae (CV) unless alongside a full application form from anyone applying to work at this school. As part of our background checks we will consider an online search for shortlisted candidates.

All staff receive information about Willington's safeguarding arrangements, Willington's safeguarding statement, Staff Behaviour Policy (code of conduct), Child Protection and Safeguarding Policy, the role and names of the DSL and the deputy(s), and [Keeping Children Safe in Education 2026 Part 1](#). Part 2 of this guidance relates to "The Management of Safeguarding" and will be issued to all Governors.

All staff receive safeguarding training at induction in line with advice from Merton Children's Safeguarding Partnership which is regularly updated and receive safeguarding updates (for example, via email, and staff meetings), as required, but at least annually. In addition, we deliver termly hot topic safeguarding update sessions for all staff.



All members of staff are trained in and receive regular updates in online safety.

All staff and governors have regular safeguarding awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Child Protection and Safeguarding Policy is made available via the school website. Hard copies of this policy can be viewed by request from the school office.

We provide a coordinated offer of Early Help when additional needs of pupils are identified and contribute to early help arrangements and inter-agency working and plans.

We will seek to ensure the suitability of adults working with pupils on school sites at any time and this includes any persons or organisations using our buildings or outside spaces in a letting or hiring agreement.

If Willington receives an allegation relating to an incident where an individual or organisation was using your premises for running an activity for pupils we follow our safeguarding policies and procedures and inform the LADO as we would with any safeguarding allegation.

Community users organising activities for pupils are aware of Willington's Child Protection and Safeguarding Policy, guidelines and procedures.

The name of the DSL and deputy(s) are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected harm and abuse.

Roles and Responsibilities

All School Staff:

All staff have a key role to play in identifying concerns and in providing help for pupils. To achieve this, they will:

- Provide a safe environment in which pupils can learn.
- Establish and maintain an environment where pupils feel secure, are encouraged to talk and are listened to.
- Ensure pupils know that there are adults in the school who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for pupils to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training to be aware of, and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Know how to respond to a pupil who discloses or alleges harm or abuse following training of 'Working together to Safeguard pupils' (2023).
- Report their concerns to the DSL immediately and on that day if they are worried a child is being abused and record their concerns. If the DSL is not contactable immediately, a Deputy DSL should be informed.
- Be prepared to refer directly to the Children and Families Hub and the police if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures and inform the Headteacher if the disclosure is an allegation against a member of staff, supply staff or volunteer or is a low level concern.
- Follow the procedures set out by the Merton Children's Safeguarding Partnership and take account of guidance issued by the Department for Education.
- Treat information with confidentiality but never promising to "keep a secret".
- Understand Early Help and be prepared to identify and support pupils who may benefit.

(Willington School reserves the right to update all policies on a regular basis)



- Know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the role of the DSL, part 1 and annex A of Keeping Children Safe in Education 2026, Willington's Child Protection & Safeguarding Policy, Staff Behaviour Policy (Code of Conduct), School Behaviour Policy, and procedures relating to the safeguarding response for pupils who go missing from education.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard pupils and that the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 are not a barrier to sharing information where a failure to do so would place a pupil at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- All staff must be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to pupils and families, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a pupil to other members of staff on a need-to-know basis.
- Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and pupils' social care.
- Be mindful that the Teacher Standards states that teachers should safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Body and Headteacher in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Staff understand their expectations, roles and responsibilities around filtering and monitoring systems.

The Headteacher

In addition to the role and responsibilities of all staff the Headteacher will ensure that:

- Willington fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- All staff are aware of who the DSL is and their role.
- Sufficient time, training, support, funding, resources, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on pupil welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of pupils.
- Provide opportunities for a co-ordinated offer of Early Help when additional needs of pupils are identified
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- With the DSL ensure adequate and appropriate cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the pupil's wishes, and feelings are considered when determining what action to take and what services to provide.
- Pupil-centred systems and processes are in place for pupils to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff, supply staff or volunteers are dealt with in accordance with guidance from Department for Education (DfE) and Merton Children Safeguarding Partnership.
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where an individual has engaged in conduct that harmed (or is likely to harm) a pupil; or if the person otherwise poses a risk of harm to a pupil.



The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

- Holds the lead responsibility for safeguarding and child protection in Willington, this responsibility is not able to be delegated.
- Will have an **“it could happen here”** approach to safeguarding.
- Liaise with the local authority, the three safeguarding partners and work in partnership with other agencies in line with Working Together to Safeguard Children. National Police Chiefs Council guidance– When to call the police should help DSLs understand when they should consider calling the police and what to expect when they do.
- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.
- Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the Prevent Referral Process and use the Prevent Referral Form to refer cases by email. If the matter is urgent, the Police must be contacted by dialling 999. In cases where further advice from the Police is sought, dial 101.
- The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the “case manager” and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a pupil to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE 2026 guidance on ‘Child on child Abuse’ when a concern is raised that there is an allegation of a pupil abusing another pupil within Willington.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns, this could be online such as Zoom or Skype. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Encourage and promote a culture of listening to pupils and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and knowledge and skills refreshed at regular intervals but at least annually.
- Have a secure working knowledge of Merton Children’s Safeguarding Partnership procedures and understand the assessment process for providing Early Help and statutory intervention, including the local authority levels of need criteria and referral arrangements. Have a clear understanding of access and referral to the Merton Early Help offer.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCo) on matters of safety and safeguarding and consult the MCSP Levels of Need document to inform decision making and liaison with relevant agencies.
- Be alert to the additional needs of pupils with Special Educational Needs and Disabilities (SEND), young carers and other vulnerable pupils, recognising that additional barriers can exist when identifying abuse, neglect or exploitation, and ensuring appropriate support and safeguarding arrangements are in place.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep pupils safe whilst they are online at school; in particular understand the additional risks that pupils with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that includes all concerns about a pupil even if there is no need to make an immediate referral and the rationale for decisions made and action taken, including decisions involving other agencies such as the Prevent Program. Records also



require a clear and comprehensive summary and details on how the concern was followed up and resolved. MYCONCERN software is used by Staff to log a concern.

- Ensure that an indication of the existence of a Child Protection file is cross referenced on the pupil school file.
- Ensure that when a pupil transfers school, their child protection file is passed to the new school within 5 days of starting a new term, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that when a pupil transfers school and is on a Child Protection Plan or is a Looked After Child, their information is passed to the new school immediately, and that the pupil's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- Ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed.
- Work with the DSL team, Local Authority and Social Care Teams to make informed decisions in the best interests of the pupil, for instance the pupil's safety, educational outcomes and welfare. This should be a matter of routine. Furthermore, the social worker and the DSL need to work together to respond to unauthorised absences and promote welfare.
- Ensure that Willington will be included in statutory discussions in cases of child on child abuse.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that pupils, including pupils with a social worker, are experiencing, or have experienced, with teachers and SLT to ensure that relevant members of staff, know who these pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that pupils in this group might face and the additional academic support and adjustments that they could make to best support these pupils.
- Report to the headteacher any significant issues for example enquiries under section 47 of the Children's Act 1989 and police investigations.
- This should include being aware of the requirement for pupils to have an Appropriate Adult. Guidance – [Police and Criminal Evidence Act 1984 Code C revised 2023](#) - Code of Practice for the detention, treatment and questioning of persons by Police Officers.
- Ensure that the case holding Social Worker is informed of any pupil currently with a Child Protection Plan who is absent without explanation.
- Ensure that all staff, within 3 months of employment at Willington School and updated once a year thereafter, sign to say they have read, understood and agree to work within Willington's Child Protection Policy, Staff Behaviour Policy (code of conduct), School Behaviour Policy and Keeping Children Safe in Education 2026 (KCSIE) Part 1 and annex A and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training, following the training guidance published by the London Borough of Merton, Safeguarding in Schools Officer, and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and governors, the Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- Establish and maintain links with the three safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Will ensure that the name of the designated members of staff for Child Protection, the DSL and deputies, are clearly advertised in Willington, with a statement explaining Willington's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2026.
- Continue to create and encourage a culture so staff feel comfortable discussing safeguarding matters in and outside of work, including online.
- Understands the filtering and monitoring systems and processes in place.



The Deputy Designated Safeguarding Lead(s):

- In addition to the role and responsibilities of all staff each Deputy DSL will:
- Be trained to the same standard as the DSL and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all the functions above.

All members of The Governing Body understand and fulfil their responsibilities to ensure that:

- They facilitate a whole school approach to safeguarding.
- Where there is a safeguarding concern, pupils's wishes, and feelings should be taken into account when determining what action to take and what services to provide. Systems should be well promoted, understood and easily accessible for pupils to confidently report abuse, knowing that their concerns will be treated seriously.
- Willington has effective safeguarding policies and procedures including a Child Protection and Safeguarding Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to pupils who go missing from education. Ensure policies are consistent with Merton Children's Safeguarding Partnership and statutory requirements, are reviewed annually and that the Child Protection policy is available on the school website.
- Willington operates safer recruitment procedures that include statutory checks on staff suitability to work with pupils and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- That at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2026) full part 1 and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- All Governors should receive appropriate safeguarding training at induction and then at regular intervals. Training should provide them with the knowledge to ensure Willington's safeguarding policies and procedures are effective.
- There are effective procedures for dealing with allegations of child on child abuse.
- All staff including temporary staff and volunteers are provided with Willington's Child Protection and Safeguarding Policy and Staff Behaviour Policy.
- Willington has procedures for dealing with allegations of abuse by staff (including supply staff and the Headteacher), contractors, volunteers against pupils and that a referral is made to the DBS and/or the [Teaching Regulation Agency](#) (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns.
- A nominated governor for safeguarding (including Online Safety) is identified.
- A member of the Senior Leadership Team has been appointed as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputies undertake DSL New to Role and then 'Update' training every two years as well as attending DSL network events and meetings.
- Pupils are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through relationships and sex education (RSE). We recognise that there cannot be a "one size fits all" style and there needs to be a personalised and contextualised approach for more vulnerable pupils, victims of abuse and those with Special Education Needs and Disabilities (SEND).
- Willington will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at Willington) are in place for all Governors.
- Any weaknesses in Safeguarding are remedied immediately.



- Willington is aware that OFSTED and ISI inspections will always report on whether arrangements for safeguarding pupils and learners are effective.
- Governors will make sure the DSL takes responsibility for understanding the filtering and monitoring systems and processes in place.
- Governors will ensure that staff understand their expectations and responsibilities around filtering and monitoring as part of safeguarding training.
- Governors will review the DfE's Filtering and Monitoring standards. The board will discuss this with the computing staff and service provider what needs to be done to support Willington in meeting standards.
- Willington will comply with The Human Rights Act 1998 setting out the fundamental rights and freedoms that everyone in the United Kingdom is entitled to. It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights, specifically:

1. Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
2. Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
3. Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,
4. Article 2: protects the right to education.

Willington will not unlawfully discriminate against pupils on the grounds of sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics), in accordance with the Equality Act 2010.

Staff and Visitor Use of Mobile Phones and Cameras

Willington operates a mobile-phone-free school day. Pupils do not have access to personal mobile phones during the day. The practical arrangements for the storage and management of pupils' mobile phones, including handing phones in at the start of the school day where applicable, are set out in the School's Behaviour Policy.

Staff and visitors must not use personal mobile phones in classrooms, corridors, playgrounds or other areas where they may come into contact with pupils. Mobile phones may only be used in designated staff areas, such as the Staffroom or Meeting Room. Photographs or recordings on School premises may only be taken using School-approved devices.

Record Keeping and Sharing Information

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, are recorded in writing (electronic or handwritten). This includes instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If in any doubt about whether to record something, it is discussed with the DSL. This information is kept on a secure password protected portal, My Concern and/or in a locked filing cabinet.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome



Concerns and referrals will be kept in a separate child protection file for each pupil. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual pupils will be retained for a reasonable period of time after they have left Willington. If a pupil for whom Willington has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the pupil arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the pupil.

Multi-agency Working

Willington has a pivotal role to play in multi-agency safeguarding arrangements. The Governing Body, SLT and DSLs need to ensure that Willington contributes to multi-agency working in line with statutory guidance *Working Together to Safeguard Children 2023*. New safeguarding partnerships and pupil death partner arrangements are now in place. Agencies will work together to safeguard and promote the welfare of pupils, including identifying and responding to their needs.

We will ensure that we will fully contribute to all social care assessments concerning pupils at Willington.

Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per the [‘Information Sharing Advice for Practitioners’ \(DfE 2024\) guidance](#).

Information will be shared with staff within the school who ‘need to know’.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard pupils and that the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 are not a barrier to sharing information where a failure to do so would place a pupil at risk of harm. There is a continuing lawful basis for sharing information where it is necessary to safeguard and promote the welfare of pupils or to protect a pupil from harm.

All staff must also be aware of the provisions in Willington’s current Data Protection and Subject Access Request Policy.

All staff and Governors should use the DfE’s data protection guidance for schools to help:

- Comply with data protection law
- Develop data policies and processes
- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches

All staff must be aware that they cannot promise a pupil to keep secrets which might compromise the pupil’s safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to pupils and



families and in this respect are confidential and the Headteacher or DSLs will only disclose information about a pupil to other members of staff on a need to know basis.

All staff will always undertake to share our intention to refer a pupil to Social Care with their parents /carers consent unless to do so could put the pupil at greater risk of harm or impede a criminal investigation.

When making decisions about sharing safeguarding information, the DSL will consider whether the sharing is necessary and proportionate to safeguard or promote the welfare of a pupil. The DSL will ensure that any information shared is relevant, accurate, up to date, shared in a timely manner and only with those who need to know. Information will be shared securely and in accordance with data protection legislation, Keeping Children Safe in Education (2026), and the Government's Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers.

Child Protection Procedures

The following procedures apply to all staff working in Willington and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a pupil is being harmed or abused or is at risk of harm or abuse.

The primary concern at all stages must be the interests and safety of the pupil. Where there is a conflict of interest between the pupil and an adult, the interests of the pupil must be paramount.

All staff are aware that very young pupils and those with disabilities, Special Educational Needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in pupils who have limited mobility.

Staff are also alert to any pupil who:

- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- has a parent or carer in custody, or is affected by parental offending
- is frequently missing/goes missing from education, home or care

Where a pupil does not require statutory Children's Social Care intervention but would benefit from additional support, Willington will follow Merton's Threshold Document and Local Assessment Protocol to determine the appropriate level of intervention. Support may be provided through community-based Early Help or targeted Family Help. Where appropriate, Family Help assessments may be coordinated by a qualified lead practitioner, such as a Family Help worker, rather than a social worker, in accordance with local arrangements. Cases will be kept under review and stepped up to Children's Social Care where the pupil's needs escalate or there are concerns that they are at risk of significant harm.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - a. Dates and times of their observations
 - b. Dates and times of any discussions in which they were involved.



- c. Any injuries identified on a body map
 - d. Explanations given by the pupil / adult
 - e. Rationale for decision making and action taken
 - f. Any actual words or phrases used by the pupil
5. Any paper records must be signed and dated by the author. The record needs to be completed by the adult who received the information.
 6. In the absence of the DSL or the deputies, staff must be prepared to refer directly to the Children and Families Hub, and the police if appropriate, if there is the potential for immediate significant harm.

Following a report of concerns the DSL must:

1. Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the Children and Families Hub and the police if it is appropriate.
2. Try to discuss any concerns about a pupil's welfare with the family and where possible to seek their agreement before making a referral to the Children and Families Hub. However, this should only be done when it will not place the pupil at increased risk or could impact a police investigation. The pupil's views should also be considered.
3. Contact the Children and Families Hub if there are grounds to suspect a pupil is suffering, or is likely to suffer, significant harm or abuse. If a pupil is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify Children and Families Hub of the occurrence and what action has been taken
4. Phone the Children and Families Hub to discuss concerns if the DSL feels unsure about whether a referral is necessary,

If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider Early Help.

When a pupil needs urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the pupil to the accident and emergency unit at the nearest hospital, having first notified the Children and Families Hub. The DSL should seek advice about what action the Children and Families Hub will take and about informing the parents, remembering that parents should normally be informed that a pupil requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

Dealing with disclosures

All staff

A member of staff who is approached by a pupil should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the pupil or other pupils safe. The degree of confidentiality should always be governed by the need to protect the pupil.

Additional consideration needs to be given to pupils with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

We are aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, pupils may feel embarrassed, humiliated, or being threatened.



This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent us from having a professional curiosity and speaking to the DSL if we have concerns about a pupil. It is also important that we determine how best to build trusted relationships with pupils and young people which facilitate communication

All staff must know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the Children and Family Hub or Police directly and must do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a pupil home.

Talking to and listening to pupils

If a pupil chooses to disclose, you **SHOULD**:

- Listen and reassure
- be accessible and receptive
- listen carefully and uncritically at the pupil's pace
- take what is said seriously
- tell the pupil that you must pass this information on
- explain what will happen next
- make a careful record of what was said in the pupil's words
- sign, date and record the time on records

You should **NEVER**:

- take photographs of injuries
- examine marks/ injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse – never ask leading questions
- make promises to pupils about confidentiality or keeping 'secrets'
- assume that someone else will take the necessary action
- jump to conclusions or react with shock, anger or horror
- speculate or accuse anybody
- confront another person (adult or pupil) allegedly involved
- offer opinions about what is being said or about people allegedly involved
- forget to record what you have been told
- delay or fail to pass the information on to the correct person
- ask a pupil to sign a written copy of the disclosure or a 'statement'.

For pupils with communication difficulties or who use alternative/augmented communication systems, staff may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other pupils.

Guiding principles, the seven R's

Receive

Listen to what is being said, without displaying shock or disbelief

Accept what is said and take it seriously

Make a note of what has been said as soon as practicable

Reassure



Reassure the pupil, but only so far as is honest and reliable

Do not make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'

Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the pupil's) in any later prosecution in court
- Do not ask the pupil why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you must do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

Report

- Share concerns with the DSL immediately.
- If you are not able to contact your DSL or the Deputy DSL, and the pupil is at risk of immediate harm, contact the Children and Family Hub or Police, as appropriate directly.
- If you are dissatisfied with the level of response you receive following your concerns, you should press the DSL for reconsideration

Record

- If possible, make some very brief notes at the time, and write them up as soon as possible. The original notes need to be kept secure and included in the Child Protection file
- Record the date, time, place, person or people present and noticeable nonverbal behaviour, and the words used by the pupil. If the pupil uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the pupil: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it

Review (led by DSL)

- Has the action taken provided good outcomes for the pupil?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?



It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out. Ensure the incident is recorded.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

Use of Reasonable Force and Restrictive Interventions

In rare circumstances, staff may use reasonable force to prevent a pupil from harming themselves or others, damaging property, or causing serious disruption. Any use of force will be necessary, proportionate and for the shortest possible time, and will never be used as a form of punishment. Willington follows the [DfE's guidance on the use of reasonable force and restrictive interventions](#), prioritising preventative strategies and de-escalation wherever possible. All incidents involving the use of reasonable force are recorded and parents are informed as soon as practicable, usually on the same day. The School reviews all incidents to support pupil wellbeing, identify any lessons learned and reduce the likelihood of future restrictive interventions.

See the Behaviour Policy for further details.

Allegations against adults who work with pupils

Procedure

Keeping Children Safe in Education 2026.

Section 1 deals with allegations against staff which meets the threshold of being investigated by the Local Authority Designated Officer (LADO). Where an allegation or safeguarding concern relates to a trainee teacher, Willington will notify the trainee's training provider, in addition to informing the Local Authority Designated Officer (LADO) where appropriate. This will ensure that the concern can be considered in relation to both the trainee's placement at Willington and their wider training programme.

This procedure must be used in all cases in which it is alleged a member of staff, supply staff, trainee teacher or volunteer in a school, or another adult who works with pupils has:

- *behaved in a way that has harmed a pupil or may have harmed a pupil.*
- *possibly committed a criminal offence against or related to a pupil.*
- *behaved towards pupils in a way that indicates he or she would pose a risk of harm to pupils; or*
- *behaved or may have behaved in a way that indicates they may not be suitable to work with pupils.*

In dealing with allegations or concerns against an adult, staff must:

Report any concerns about the conduct of any member of staff, supply staff or volunteer to the Headteacher immediately.

- If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.



- There may be situations when the Headteacher or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to pupils or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher or Chair of Governors they will contact the LADO immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, Willington will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care via the Children and Family Hub and/or the police.

When using an agency for supply staff, Willington will inform the agency of its process for managing allegations.

Where an allegation is made against a member of supply staff, the Headteacher will immediately contact both the agency concerned and the LADO. Willington will ensure that any allegations are dealt with appropriately and liaise with relevant parties. Willington will continue to support any investigation that is required.

Section 2 of Part Four of *Keeping Children Safe in Education* (2026) sets out the expectations for managing low-level concerns about adults working in or on behalf of the School. Low-level concerns will always be taken seriously and should be reported promptly to the Headteacher (or to the Chair of Governors where the concern relates to the Headteacher). Where a concern is initially reported to the DSL, they will inform the Headteacher as appropriate. The Headteacher (or Chair of Governors) will actively consider whether the concern meets the threshold for consultation with, or referral to, the Local Authority Designated Officer (LADO). Where there is any uncertainty, advice will be sought from the LADO before any internal investigation is undertaken, in accordance with KCSIE 2026 and local safeguarding procedures.

Low-level concerns which are shared about trainee teachers, supply staff and contractors should be notified to their employers/training provider, so that any potential patterns of inappropriate behaviour can be identified.

Examples of such behaviour could include, but are not limited to:

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

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of Willington may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which Willington's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Low-level concerns about a member of staff should be reported to the Headteacher. Where a low-level concern is raised about the Headteacher, it should be shared with the Chair of Governors (see Low Level Concerns Policy).

If there is any doubt whether the information shared about a member of staff, supply staff or contractor then they must consult the Local Authority Designated Officer (LADO).



If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the pupil and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2023). In addition to these definitions, pupils can also be abused by being sexually or criminally exploited, honour-based abuse, forced marriage or female genital mutilation.

What is abuse, neglect and exploitation?

A form of maltreatment of a pupil. Somebody may abuse or neglect a pupil by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on pupils of all forms of domestic abuse, including where they see, hear, or experience its effects. Pupils may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Pupils may be abused by an adult or adults, or another pupil or pupils.

Physical abuse

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

Most pupils collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no pupil should be asked to remove clothing by a member of staff of Willington.

Indicators of physical abuse / factors that should increase concern

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



- Recurrent injuries or burns
- Bald patches.

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

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

You should be concerned if a pupil:

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a pupil such as to cause severe and adverse effects on the pupil's emotional development. It may involve conveying to a pupil that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling or name-calling, as well as not giving pupils 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 pupils. These may include interactions beyond a pupil's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing a pupil from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils. Some level of emotional abuse is involved in all types of maltreatment of a pupil, although it may occur alone. Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Pupils can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards pupils. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later.

Indicators of emotional abuse



Developmental issues

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

Behaviour

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

Social issues

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

Emotional responses

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside 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 can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.



Sexual abuse can occur online and offline and may be perpetrated by adults or by other pupils. Technology may be used to facilitate abuse, including through the creation or sharing of indecent images, AI-generated sexual images, online grooming or coercion.

Sexual abuse is most commonly perpetrated by someone known to, and trusted by, the pupil. This may include family members, relatives, family friends, neighbours, carers or professionals working with the pupil. However, sexual abuse can also be perpetrated by strangers or by other pupils.

Pupils may also be at risk of Child Sexual Exploitation (CSE), which is a form of child sexual abuse.

Characteristics of child sexual abuse:

- planned and involve grooming, although it can also be opportunistic – people do not sexually abuse pupils by accident, though sexual abuse can be opportunistic
- grooming the pupil – people who abuse pupils take care to choose a vulnerable pupil and often spend time making them dependent (this may occur online)
- perpetrators often seek to gain the trust of the pupil and those around them, reducing the likelihood that concerns will be recognised or reported

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

Indicators of sexual abuse

Physical observations:

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

Behavioural observations:

- Sudden reluctance to attend school
- Unexplained gifts or money
- Secretive use of devices
- Unexplained relationships with older individuals
- Sharing or receiving sexual images
- Significant changes in behaviour
- Self-harm
- Suicidal thoughts
- Anxiety
- Low mood
- Withdrawal from friends
- Sexually inappropriate online behaviour

Neglect

Neglect is the persistent failure to meet a pupil's basic physical and/or psychological needs, likely to result in the serious impairment of the pupil's health or development.



Neglect may occur during pregnancy as a result of maternal substance abuse. Once a pupil is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a pupil 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 pupil's basic emotional needs.

Neglect is a lack of parental care, but poverty and lack of information or adequate services can be contributory factors.

Far more pupils are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of pupils experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a pupil from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of pupils under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: pupils who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the pupil. The duty to safeguard and promote the welfare of pupils (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a pupil continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff must be discussed with the DSL.

It is important to recognise that indicators alone cannot confirm whether a pupil is being abused. Each pupil should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect

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



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

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies
- Poor attachment to caregivers and emerging mental health difficulties

Child on Child Abuse (including harassment and violence) (Part 5, KCSIE 2026)

In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Willington Prep School recognises that pupils can abuse their peers.

The forms of child on child abuse are outlined below:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual Violence and Sexual Harassment.
- The making and sharing of nudes and semi-nude images and/or videos.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- initiation/hazing type violence and rituals.
- Misogyny and misandry alongside racism and other forms of discriminatory bullying/abuse

Child on Child abuse can refer to all these definitions and a pupil may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence). It is more likely that girls will be victims and boys' perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

We believe that all pupils have a right to attend school and learn in a safe environment. Pupils should be free from harm by adults and other pupils in school.

It will not be passed off as 'banter', 'boys being boys' or 'part of growing up', and staff will challenge inappropriate behaviour between pupils. Any downplaying of certain conduct can lead to a culture of unacceptable behaviour which will lead to pupils not reporting or normalising abuse causing an unsafe environment. We are clear that there will be a zero-tolerance approach to any form of abuse including child on child abuse.



This school understands that even if there are no reports of child on child abuse, this does not mean that it is not happening.

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

- Taking a whole school approach to safeguarding & child protection through our safeguarding curriculum.
- All staff being trained and highly vigilant and aware of specific characteristics which may indicate child on child abuse, for example, vulnerability and controlling behaviour. If staff have any concerns about child-on-child abuse they should speak to their DSL
- Providing a values-based curriculum, underpinned by Willington's behaviour policy and pastoral support, and by a planned programme of evidence-based content delivered through the curriculum.
- Working in partnership with parents and carers.
- Engaging with specialist support and interventions.

Responding to reports of Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence

Harmful sexual behaviour (HSB) exists on a continuum and can occur online or offline. It can range from inappropriate behaviour through to abusive or violent behaviour. Harmful sexual behaviour should never be dismissed as "banter", "part of growing up", or "just having a laugh". Staff should always consider whether behaviour is developmentally appropriate and respond proportionately, ensuring victims are supported and protected.

Sexual harassment means unwanted conduct of a sexual nature. It can occur online or offline and may violate a child's dignity, make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment.

Examples may include:

- sexual comments
- sexual jokes
- sexual taunting
- physical behaviour such as deliberately brushing against someone
- displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment (including the creation or sharing of AI-generated indecent or sexually explicit images, including deepfakes)
- making and sharing of sexual images
- sharing AI-generated indecent images
- unwanted sexual messages

Referrals to Children's Social Care and Family Help

Where a report of sexual violence, sexual harassment or harmful sexual behaviour is received, the DSL will:

- Make a referral to Children's Social Care without delay where there is reasonable cause to suspect that a pupil is suffering, or is likely to suffer, significant harm.
- Inform parents/carers at the point of referral, unless doing so would place a pupil at increased risk of harm, prejudice a police investigation, or otherwise not be in the pupil's best interests.
- Take immediate action to safeguard the reported victim and other pupils, implementing appropriate protective measures and risk assessments where necessary. Willington will not wait for the outcome of a Police or Children's Social Care investigation before taking appropriate safeguarding action.
- Continue to review and manage risk throughout any investigation, ensuring that appropriate support is provided to all pupils involved.



- Consider a referral for Family Help or other early support services where Children's Social Care determines that the threshold for a statutory assessment is not met, but the pupil and family would benefit from coordinated support.
- Make a further referral to Children's Social Care if new information comes to light, safeguarding concerns persist, or the level of risk increases.

Ongoing Response:

The School will respond to every concern or report of harmful sexual behaviour, sexual harassment or sexual violence, whether it has occurred inside or outside school, online or offline.

- Pupils making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- Pupils should never be given the impression that they are creating a problem by reporting sexual violence, sexual harassment or harmful sexual behaviour. Nor should a victim ever be made to feel ashamed for making a report.
- We will carefully listen to the pupil, being non judgemental.
- Staff taking the report will inform the DSL or a Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the pupil at greater risk).
- If a pupil is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to the Merton Children's Safeguarding Partnership.

Action: The DSL will consider: -

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the pupils involved.
- Developmental stages of the pupils.
- Any power imbalance between the pupils.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Options:

- Manage internally
- Early Help intervention
- Refer to Merton Children's Safeguarding Partnership
- Report to the police all cases of sexual violence (generally in parallel with a referral to Merton Children's Safeguarding Partnership)

Risk Assessment:

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider:



- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other pupils at Willington.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform Willington's approach to supporting and protecting pupils.

Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Merton Children's Services.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, Willington will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

We will reassure pupils that the law is in place to protect rather than to criminalise them.

Where a criminal investigation into sexual assault leads to a conviction or caution, Willington will, if it has not already, consider any suitable sanctions considering their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at Willington, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other affected pupils & adults will receive appropriate support and safeguards on a case-by-case basis.

Willington will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

Willington recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Physical Abuse

While a clear focus of child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has



been committed, will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Harmful Sexual Behaviour

Pupils' sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in Keeping Children Safe in Education 2026. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

Sexual behaviour between pupils will be considered harmful if one of the pupils is much older if there is more than 2 years difference in age or if one pupil is in puberty and the other is not. A younger pupil can abuse an older pupil, particularly if one has power over the other, for example, with a disability or Special educational Needs.

Pupils displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Anti-Bullying/Cyberbullying

Willington's Anti-Bullying Policy is set out in a separate document and acknowledges that allowing or condoning bullying, including prejudice-based and discriminatory bullying or abuse such as racism, sexism, misogyny, misandry, homophobia, biphobia, transphobia, disability-related bullying and other forms of discriminatory behaviour, may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that pupils with SEND and/or differences/ perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a pupil is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider child protection procedures.

PSHCEE education regularly provides opportunities for pupils to understand bullying is wrong, its impact and how to deal with it.

Pupils who are Lesbian, Gay, Bisexual or LGBT+

The fact that a pupil may be lesbian, gay, bisexual or LGBT+ is not, in itself, an inherent risk factor for harm. However, pupils who are LGBT+, or who are perceived by others to be LGBT+, can be vulnerable to bullying, prejudice, discrimination and abuse, including homophobic, biphobic and transphobic bullying.

Risks may be compounded where pupils lack a trusted adult with whom they can speak openly. Willington is committed to providing a safe, respectful and inclusive environment where pupils feel able to raise concerns and seek support from a trusted member of staff.

Relationships Education, Relationships and Sex Education (RSE), Health Education and the wider curriculum promote respect, inclusion and positive relationships. The School has a zero-tolerance approach to all forms of prejudice-based



and discriminatory bullying or abuse, including homophobic, biphobic and transphobic bullying, and will respond to any incidents in accordance with its Behaviour, Anti-Bullying and Safeguarding policies.

Gender Questioning Pupils

Willington recognises that some pupils may question their gender. The School will consider any request for support on an individual basis, taking a cautious, evidence-informed approach that places the pupil's welfare at the centre of decision-making.

In accordance with Keeping Children Safe in Education (2026) and the [DfE's non-statutory guidance on Gender Questioning Children](#), the School will:

- consider the full range of the pupil's needs and circumstances;
- work in partnership with parents, except in the rare circumstances where involving parents would place the pupil at risk of significant harm;
- take account of any relevant clinical or professional advice that is available;
- consider the impact of any proposed support on the pupil's safety, wellbeing, educational needs and on other pupils;
- consider wider safeguarding vulnerabilities, including the risk of bullying, harassment, discrimination or abuse;
- make decisions on a case-by-case basis, recognising that there is no general presumption that social transition will be in a pupil's best interests.

Willington maintains a culture in which pupils feel safe to speak to trusted adults about any concerns and where safeguarding decisions are always made in the best interests of the pupil.

Online Safety

Willington has an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents. We follow the 'Teaching online safety in school' Guidance and Purple Mash Online Safety supporting schools to teach their pupils how to stay safe online, within new and existing school subjects ([Teaching Online Safety in Schools](#)) to guide practice.

Pupils increasingly use electronic equipment, including at home, on a daily basis to access the internet, share and view content and images via social media, messaging services, live-streaming platforms, online gaming and other online services.

Some adults and other pupils use these technologies to harm pupils. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing pupils to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate or harmful material online. This includes, but is not limited to, pornographic websites or those which promote extremist behaviour, criminal activity, suicide, or eating disorders. In accordance with KCSIE 2026, Willington Prep also recognises the risks posed by exposure to misinformation, disinformation, and conspiracy theories. These can negatively influence a pupil's beliefs, behaviour and emotional wellbeing. Staff are aware of these specific risks and remain vigilant in identifying and responding to such safeguarding concerns.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated by the school online safety officer.



The governing body ensures that appropriate filters and monitoring systems are in place. This is to ensure that pupils have access to 'safe' information and that 'over blocking' does not restrict access to their learning. Government supported online safety websites provide information to support governing bodies to keep pupils safe online (including when pupils are at home). Please see below list of links on the section entitled **Further advice on safeguarding and child protection is available** for guidance and information. The Online Safety Officer and DSL manages and logs any online safety incidents.

Willington ensures that effective monitoring systems are in place using Light Speed. To maintain robust filtering and monitoring, we follow the latest Department for Education (DfE) guidance, including the updated [Meeting digital and technology standards in schools and colleges \(2025\)](#). Our approach also reflects the DfE's guidance on the [Generative Artificial Intelligence in Education \(2025\)](#). We ensure that filtering and monitoring systems are capable of identifying and responding to risks associated with generative AI, including AI-generated images, misinformation, disinformation, deepfakes, impersonation, online grooming and inappropriate sexual content. Our cybersecurity protocols are regularly reviewed to align with national standards including the [DfE's Generative AI: product safety expectations guidance](#) and [DfE Cyber Security Standards for Schools and Colleges](#), ensuring that all digital systems are secure, resilient, and compliant with statutory safeguarding requirements.

Online risks Include:

- pornography
- violent content
- online abuse/bullying
- misogyny
- misandry
- extremist material
- criminal exploitation
- gambling-related content
- suicide
- self-harm material
- eating disorder content
- misinformation
- disinformation
- conspiracy theories
- AI-generated or manipulated content.

Willington also recognises that pupils may be vulnerable to online fraud, scams and financial exploitation, including phishing, fake competitions, identity theft and other forms of online deception. Online safety education will include helping pupils recognise and respond safely to these risks.

It is the duty of all staff who use any kind of technology in their teaching that they are aware of the expectations on them to monitor the pupils' use of technology. Every member of staff is required to know how to monitor their class using Light Speed. The Designated Safeguarding Lead (DSL) and the Online Safety Officer (both members of the SLT) oversee the school's filtering and monitoring arrangements. Educaite receives and reviews daily Fastvue filtering reports, while the DSL and Online Safety Officer receive daily monitoring captures from the Light Speed monitoring system. All alerts are reviewed promptly and acted upon in accordance with the school's safeguarding procedures. In addition, the DSL, Online Safety Officer and Safeguarding Team formally review the effectiveness of the school's filtering and monitoring arrangements at least every half term. These reviews cover all internet-connected devices used by pupils across the school. Staff understand that filtering and monitoring systems supplement, but do not replace, effective supervision, professional curiosity and good classroom practice.

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:

(Willington School reserves the right to update all policies on a regular basis)



- cause harm,
- disrupt teaching,
- break school rules,
- commit an offence,
- cause personal injury, or
- damage property.

Any data, files or images that are believed to be illegal must be passed to the police as soon as practicable, including nude or semi-nude images and/or videos of pupils, without deleting them.

Any data, files or images that are not suspected to contain evidence of a criminal offence may be deleted or retained as evidence of a breach of Willington's Behaviour Policy. The School follows the [DfE's Searching, Screening and Confiscation guidance](#).

Sport

Willington recognises that participation in sport contributes positively to pupils' physical health, mental wellbeing and personal development. The School may organise some sporting activities and competitions by biological sex where this is necessary to ensure physical safety or competitive fairness.

Any request from a pupil regarding how they participate in sport will be considered on a case-by-case basis. Decisions will be made in the best interests of the pupil, taking into account their welfare, the safety and fairness of all pupils, the nature of the activity, the rights of others, and the guidance set out in *Keeping Children Safe in Education* (2026), including the section on requests for support relating to social transition. Where appropriate, the School will work with parents, carers and relevant professionals to determine suitable arrangements.

Racist Incidents

Willington recognises and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record on the school management system, iSams.

Radicalisation and Extremism

[The Prevent Duty for England and Wales 6th March 2024](#) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other pupils' services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as '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. ([Revised Prevent Duty Guidance for England and Wales 6th March 2024](#)).

Some pupils are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

Willington is clear that exploitation of susceptible pupils and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing pupils and young people from being drawn into terrorism.



Willington seeks to protect pupils and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided throughout the curriculum to enable pupils to discuss issues relating to religion, ethnicity, culture, equality, diversity and inclusion, and to challenge racism, bullying, derogatory behaviour and prejudice-based conflict. Willington follows the [DfE guidance Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#). Where appropriate, PSHE curriculum resources are drawn from PSHE Association quality-assured materials to support age-appropriate teaching and promote respectful relationships.

Governors, the Headteacher and the DSL will assess the level of risk within Willington and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to Willington's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases by e-mail to the Merton Children's Safeguarding Partnership. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or contact the Anti-terrorism hotline on 0800 789 321.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Indicators of susceptibility to extremist ideology

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of beliefs.
- Seek to provoke others to terrorist acts.
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit susceptibilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those susceptible.

Indicators of susceptibility include:

- Identity Crisis – the pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.



- Personal Crisis – the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the pupil may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Needs and Disability – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, financial psychological or sexual abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that several abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to pupils and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships, including impacting upon their own personal, intimate relationships. Pupils who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a pupil suffering or witnessing domestic abuse.

Child-to-parent/carer abuse may include physical violence, threats, intimidation, controlling or coercive behaviour, emotional abuse, damage to property or financial abuse directed towards a parent or carer. Willington recognises that this behaviour is a safeguarding concern and may indicate that a pupil has experienced trauma, abuse, neglect or other unmet needs. Staff should report any concerns to the DSL, who will consider appropriate support for both the pupil and their family, including referral to Children's Social Care or other agencies where appropriate.

What should I do if I suspect a family is affected by domestic abuse?

To talk through your concerns, call the Merton Children's Safeguarding Partnership or talk to your local outreach service.



Operation Encompass

Willington Prep School participates in the Operation Encompass programme, a statutory information-sharing partnership between the police and educational settings that supports pupils who have experienced domestic abuse. Under this scheme, when the police attend an incident of domestic abuse where a pupil is present or may be affected, they notify Willington's DSL before the start of the next school day. This early notification enables the DSL to provide timely, appropriate support to the pupil in line with Willington's existing safeguarding responsibilities under KCSIE 2026 and annex A. Operation Encompass does not replace statutory safeguarding procedures but complements them by ensuring that key adults in the school are informed at the earliest opportunity so that pupils can be supported effectively and sensitively in school.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a pupil in sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic and other resources. In some cases, the abuse may involve an exchange for something the victim needs or wants and will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and pupils or adults. The abuse can be a one off occurrence or a series of incidents over time. It can range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. Victims can be exploited even when activity appears to be consensual and exploitation as well as being physical can be facilitated and/or take place online.

All staff are aware of the link between online safety and susceptibility to exploitation.

Any concerns that a pupil is being or is at risk of being sexually exploited should be passed immediately to the DSL.

Willington is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a pupil to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the pupil and parents to assess this risk.

Willington is aware that a pupil often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the pupil may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Pupils also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying pupils 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.
- go missing from school or home and found in areas away from their own
- have been the perpetrator or alleged perpetrator of serious violence as well as the victim

Child Criminal Exploitation & Gangs

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence, which can be in relation to their peers or to a gang-involved adult in their household. Exploitation may be committed by an individual, organised groups or criminal networks.

A pupil who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect. A victim may not recognise themselves as being exploited and may identify with, or feel loyalty towards, the individual, group or criminal network exploiting them.

The risk or potential risk of harm to the pupil may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Child Criminal Exploitation (CCE) is a form of abuse where pupils are manipulated, coerced or deceived into criminal activity for the benefit of others. Criminal exploitation is a common feature of county lines activity, with pupils being exploited to move and store drugs, money or weapons. Modern slavery, including human trafficking, is a distinct safeguarding risk and may involve children being exploited for criminal, sexual, domestic or labour purposes. "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of "deal line". Pupils may be subjected to violence, intimidation, debt bondage or coercion and pressured into



carrying drugs, money or weapons, committing theft or other criminal offences. Pupils who are criminally exploited may go missing, appear with unexplained money or possessions, or have been trafficked. Where there are indicators that a child may be a victim of modern slavery or human trafficking, the DSL will work with Children's Social Care and the Police and consider whether a referral should be made to the National Referral Mechanism (NRM) in accordance with the Modern Slavery Statutory Guidance.

A pupil who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a pupil is being, or is at risk of being, criminally exploited will be passed without delay to the DSL. Willington recognises the clear link between regular non-attendance at school and exploitation. Staff will consider a pupil to be at potential risk where there is regular non-attendance and will make reasonable enquiries with the pupil and parents to assess this risk. Staff and the DSL should also be alert to the possibility that a pupil may have been criminalised for actions carried out under coercion or exploitation. This should inform and provide context for any disciplinary action or safeguarding referral, whilst not excusing unlawful or harmful behaviour.

Any concerns that a pupil may be at risk of child criminal exploitation, including county lines, gang involvement, modern slavery or human trafficking, will be reported immediately to the DSL. The DSL will make a referral to Merton Children's Social Care where appropriate and will work with partner agencies, including the Police, to safeguard the child. Where there are indicators that a child may be a victim of modern slavery or human trafficking, the DSL will also consider whether a referral to the National Referral Mechanism (NRM) should be made in accordance with the Modern Slavery Statutory Guidance. If there are concerns about a child's immediate safety, the Police will be contacted on 999.

Pupils at Risk or Involved in Serious Violent Crime

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and may also be associated with child criminal exploitation.

Staff should be alert to indicators that a pupil may be at risk of, or involved in, serious violence.

These may include:

- unexplained gifts or new possessions
- increased absence from school
- changes in friendships or peer groups
- a significant decline in educational performance
- signs of self-harm or deteriorating wellbeing
- unexplained injuries
- carrying or expressing an intention to carry a weapon
- other concerning changes in behaviour.

Risk may be increased where pupils have experienced disrupted education (including repeated suspensions, permanent exclusion, time in Alternative Provision or a Pupil Referral Unit), have a history of offending, have experienced abuse or neglect, or are vulnerable to criminal exploitation.

Early, evidence-based support is vital for pupils considered to be at risk of serious violence. Where concerns arise that a pupil may be carrying, using or intending to use a weapon, staff must report this immediately to the DSL. The DSL will assess the risk, consider wider safeguarding concerns, implement appropriate safety and support measures where necessary, and involve the police or other agencies where appropriate.

The Making and Sharing of Nudes and semi-nudes



The making and sharing of nudes or semi-nudes and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given pupils the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Nudes and semi nudes refer to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- Voyeurism Act 2019 – Upskirting is now a criminal act in the UK. The response to this in schools need to be the same as child on child sexual abuse and may including contacting the police. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders. “
-

All incidents of this nature will be treated as safeguarding concerns. Regardless of any apparent consent between pupils, every incident will be managed in accordance with the [UKCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the procedures set out in this policy, even where the DSL determines that the matter can be managed internally without referral to external agencies.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the pupils involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the pupil at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the Merton Children's Safeguarding Partnership or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the pupil's development stage or are violent.
- The imagery involves sexual acts.



- The imagery involves anyone aged 12 or under.
- There is reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, for example the pupil is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without referral to the Merton Children's Safeguarding Partnership or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the pupil in the imagery.
- The pupil is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the pupils involved.
- The image is of a severe or extreme nature.
- The pupil involved understands consent.
- The situation is isolated or if the image has been more widely distributed.
- There are other circumstances relating to either the sender or recipient that may add cause for concern.
- The pupils have been involved in incidents relating to youth produced imagery before.
- Voyeurism occurred.

If any of these circumstances are present the situation will be referred, according to our child protection procedures, including referral to the Children and Family Hub or the Police.

The DSL will record all incidents of sharing nudes and semi-nudes, including the actions taken, rationale for actions and the outcome.

Honour-Based Abuse

Honour based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. They are a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour-Based Abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.



The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in Willington, whether they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using Willington's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

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



This procedure is also known as cutting, sunna, gudnin (Somali) and Tahur (Sudanese)

Circumstances and occurrences that may point to FGM happening are:

- Pupil talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Pupil's family being from one of the 'at risk' communities for FGM:
- Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia, and Pakistan
- Knowledge that the pupil's sibling has undergone FGM
- Pupil talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a pupil 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

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

It is a crime to carry out any conduct whose purpose is to cause a pupil to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages'; as well as legal marriages.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the Merton Children's Safeguarding Partnership.



One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance to speak to a pupil who is a potential victim and have just one chance to save a life.

Willington is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a pupil for a period of 28 days or more, with the agreement of the pupil's parents. It applies to pupils under the age of 16 years old or 18 years old if the pupil is disabled.

Pupils looked after by the local authority or who are placed in residential schools, pupils' homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and pupils may be privately fostered at any age.

Willington recognises that most privately fostered pupils remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the pupil has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, when a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the Merton Children's Safeguarding Partnership.

Looked After Children (LAC) and Previously Looked After Children (PLAC)

The most common reason for pupils becoming looked after is as a result of abuse and neglect.

Willington ensures that staff have the necessary skills and understanding to keep looked after pupils safe. Appropriate staff have information about a pupil's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the pupil and contact arrangements with birth parents or those with parental responsibility.

The designated teacher and governor for pupils looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The designated teacher for pupils looked after and the DSL will have details of the pupil's social worker and the name and contact details of the Merton Council's Head of Virtual School. It is the Virtual School Head's extended responsibility for pupils in kinship care and ensuring appropriate liaison and support mechanisms are in place for these pupils.

The designated teacher for pupils looked after and pupils previously looked after will work in partnership with the Virtual School Assistant Headteacher to discuss how Pupil Premium Plus funding can be best used to support the progress of pupils looked after in the school and meet the needs of the pupil's within their personal education plan.



Previously looked after pupils are those who immediately after being in care (as defined above) became subject to an adoption order, pupil arrangements order or special guardianship order.

Contextual Safeguarding – Risks outside of the home

As well as threats to the welfare of pupils from within their families, pupils may be vulnerable to abuse or exploitation from influences outside of their families. Willington recognises that these extra-familial threats might arise from within their peer groups, from within the wider community and/or online. These threats can take a variety of different forms and pupils can be vulnerable to multiple threats, including:

- exploitation by criminal gangs and organised crime groups such as county lines
- trafficking
- online abuse
- sexual exploitation
- extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials.

Staff are trained on contextual influences and follow the school procedures for reporting concerns. Any concerns regarding supply staff should be referred immediately to the Head teacher.

The DSL will ensure that information is shared in the referral process to help social care assessments consider contexts outside of the home.

Pupils with special educational needs and disabilities

Willington recognises that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers that can exist when recognising abuse and neglect in this group of pupils include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's disability without further exploration.
- being more prone to peer group isolation than other pupils.
- the potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Willington addresses these additional challenges by considering extra pastoral support for pupils with SEN and disabilities.

Pupils with Medical Conditions

Willington recognises that some pupils with medical or physical health conditions may face additional safeguarding barriers, similar to those experienced by some pupils with SEND. These pupils may require additional support to recognise, communicate or report abuse or neglect, and staff will remain alert to their individual needs and vulnerabilities. Where appropriate, the School will work closely with parents, health professionals and other agencies to ensure suitable safeguarding arrangements are in place. Individual Health Care Plans are used, where required, to identify, manage and communicate a pupil's medical needs. Further information is set out in the Mental Health section of this policy.

Alternative Provision



Alternative Provision is education arranged by local authorities for pupils who, because of exclusion, illness, or other reasons, would not otherwise receive suitable education. It also includes education arranged by schools for pupils on a fixed-period exclusion and pupils directed to off-site provision to improve their behaviour.

Willington will ensure that for every pupil attending Alternative Provision, we retain overall responsibility for the safeguarding and welfare of that pupil. We will carry out appropriate checks to ensure that all safeguarding policies and procedures are in place at the provision, that all staff have been recruited in line with Safer Recruitment practices, and that they have received appropriate safeguarding training. A member of staff will visit the setting to confirm that these standards are met and that the placement is appropriate for the pupil's needs.

In line with KCSIE 2026 (para. 172), we recognise that some pupils are potentially at greater risk of harm than others, both online and offline - particularly those who are accessing education outside the usual school environment. Our safeguarding arrangements and oversight of Alternative Provision will reflect this increased vulnerability, ensuring procedures are in place to protect these pupils and respond swiftly to any concerns.

Pupils Missing Education

All pupils, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

There is a difference in pupils 'missing in education' and 'pupils absent in education'. Pupils 'missing in education,' is the next step up from pupils 'absent in education.'

Willington recognises that pupils missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Willington recognises that attendance is impacted by a pupil's mental health.

Where possible Willington will hold more than one emergency contact number for each pupil.

Willington will ensure that there is a record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2024.

Willington will ensure that there is a record of joiners and leavers as defined in [The School Attendance \(Pupil Registration\) \(England\) 2024](#).

When removing a pupil's name, Willington will notify the Local Authority of: (a) the full name of the pupil, (b) the full name and address of any parent with whom the pupil normally resides, (c) at least one telephone number of the parent, (d) the pupil's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the pupil's name is to be removed from the school register.

Willington will make reasonable enquiries to establish the whereabouts of a pupil jointly with the Local Authority, before deleting the pupil's name from the school register if the deletion is under regulation 9 The School Attendance (Pupil Registration) 2024.

Willington will:

- Enter pupils on the admissions register on the first day on which the school has agreed, or has been notified, that the pupil will attend Willington.
- Notify the Local Authority within five days of adding a pupil's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.



- Monitor each pupil's attendance through their daily register and follow the Merton Council procedure in cases of unauthorised absence.
- Remove a pupil's name from the admissions register on the date that the pupil leaves Willington.
- Willington will notify the Local Authority when they are about to remove a pupil's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the pupil's name is due to be removed.

Elective Home Education

Elective home education can mean that some pupils are not in receipt of suitable education, however, many home educated pupils have a positive learning experience. Where a parent/carer expresses their intention to remove a pupil from school with a view to educating at home, we will work together with key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each pupil. This is particularly important where a pupil has SEND, is vulnerable, and/or has a social worker.

Pupils Missing In Education

Most pupils engage positively with school and attend regularly. However, in order to flourish, some pupils require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that pupils accessing alternative provision, or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as pupils Missing Out On Education, because they are not accessing their education in school in the 'usual way'.

Where pupils are educated offsite or in dual placements safeguarding risk assessments are completed.

Willington will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable

Willington will ensure that and parents (and the local authority where the pupil has a statement of special educational needs) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;

Willington will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it.

Willington will monitor and track pupils attending alternative provision to ensure that the provision meets the needs of the pupil

Willington will comply with regular data returns requested by the Local Authority, regarding all pupils of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

Willington's leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

Willington's leadership will report to the governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

Pupils who need the support of a Social Worker



Pupils may need a social worker due to safeguarding or welfare needs, such as abuse, neglect and complex family circumstances

In addition to their responsibility with Looked After/ Previously Looked After pupils the Virtual School Headteacher has a strategic responsibility for promoting the educational outcomes of pupils with a social worker. This includes the oversight of attendance, attainment and progress. The Virtual School Headteacher will engage with key professionals to help them understand the role they have in improving outcomes for pupils.

These experiences can leave pupils vulnerable to further harm, as well as potentially creating barriers to attendance, learning, behaviour and mental health

The local authority should inform Willington if a pupil has a social worker, and the DSL should hold and use this information in the best interests of the pupil's safety, welfare and educational outcomes, such as when decisions are made on

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

School Attendance and Behaviour

[Working Together to Improve School Attendance July 2026](#) is statutory guidance. Additional policies and procedures are in place regarding school attendance and behaviour.

Willington recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of pupils. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect pupils from harm.

Willington will work in partnership with Merton Police and other partners for reporting pupils that go missing from Willington site during the school day. Staff will be alert to signs of pupils at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a pupil is or at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in “Positive Options” techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a pupil may be considered under pupil protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with pupils, and all staff have been given ‘Safe Practice’ guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for pupils with SEND the school will consider the risks, given the additional vulnerabilities of these pupils.



Health (including Mental Health)

Mental Health

School has an important role to play in supporting the mental health and wellbeing of our pupils. All staff are aware that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation. Although only appropriately trained professionals should diagnose mental health conditions, all staff are well placed to observe pupils day-to-day, recognise early warning signs, identify pupils who may be experiencing mental health difficulties or be at risk of developing them, and ensure concerns are shared promptly so that appropriate support can be provided at the earliest opportunity.

Where pupils have suffered abuse and neglect and other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these pupils' experiences can impact on mental health, behaviour and education.

Where a member of staff has a concern about a pupil's mental health that is also a safeguarding concern, they must follow the school's child protection procedures and speak immediately to the DSL or deputy DSL's. Mental health concerns should never be viewed in isolation and staff should always consider whether they may be linked to abuse, neglect, exploitation or other safeguarding concerns. Willington Prep has access to a range of advice to help them identify pupils in need of extra mental health support; this includes working with external agencies. School has access to [Mental Health and Behaviour in Schools Guidance](#)

Depending on the level of need, this may include pastoral support within school (such as ELSA Assistant), community-based Early Help, targeted Family Help, referral to Children's Social Care, NHS Child and Adolescent Mental Health Services (CAMHS) or other specialist mental health services.

Any pupil with a significant health condition requiring regular medication or treatment will require an Individual Health Care Plan which will be completed with the parent and school matron. It is vital that parents inform us if their pupil has a health condition of this nature to enable us to ensure that their pupil's health needs are managed appropriately whilst they are at school. Information from this plan will be shared with key staff members to ensure that they are alert to the pupil's individual needs.

Willington is committed to identifying concerns early and providing timely, evidence-informed support to promote positive mental health and wellbeing and to reduce the likelihood of concerns escalating.

Whistleblowing

We recognise that pupils cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in Willington's safeguarding arrangements. Staff can use the [Low Level Concerns Policy](#) in the first instance if they wish to raise a concern that may not necessarily reach the threshold for referral to the LADO. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.



Whistle-blowing regarding the Headteacher should be made to the Chair of the Governing Body, whose contact details are readily available to staff by contacting the Clerk to the Governors, through the school office or emailing the Chair of the Governing Body, (currently co-chair Faith Pengelly and Chris Bates) directly on chairofgovernors@willingtonschool.co.uk.

Premises, Site Security and Safeguarding

Willington recognises that the safety and security of its premises form an integral part of its safeguarding arrangements. The School works in conjunction with its Health & Safety, Premises Management and Risk Assessment policies to ensure compliance with the Education (Independent School Standards) Regulations and to provide a safe environment for pupils, staff and visitors.

Any premises or site security issues which may have safeguarding implications, including access control, supervision, blind spots, visitor management, site security, lettings or community use of the premises, will be reported promptly to the Designated Safeguarding Lead and/or the Health & Safety Lead. Appropriate risk assessments will be undertaken and reviewed to ensure that any safeguarding risks are identified, managed and, where possible, eliminated.

Pupil Voice (Feb 2026)

As part of pupil voice consultation, a group of pupils met in February to represent the wider school community and share their perspectives on school safeguarding policy that directly affects them. When reviewing the pupil friendly version of the Willington Prep Safeguarding and Child Protection Policy (Annex B), pupils confirmed that they understand and agree with the principles outlined and reported that they feel safe in school and confident to speak out if they have a worry or concern. Pupils particularly valued the Willington commitment to listening to pupils, taking worries seriously, protecting them and helping them to feel safe both in school and beyond. They also expressed strong agreement with the message that if a pupil feels scared to speak, Willington will listen, believe them and ensure their feelings matter. This feedback reflects the pupils' sense of trust in the safeguarding culture at Willington and reinforces the importance of their voice in shaping our practice.

Links with other school policies:

- *Behaviour*
- *Anti-bullying*
- *Staff handbook*
- *Staff Behaviour (Code of Conduct)*
- *SEND*
- *Low Level Concerns Policy*
- *Whistleblowing*
- *Health & Safety*
- *Complaints*
- *Attendance*
- *Curriculum*
- *Teaching and Learning*
- *Online Safety, including staff use of mobile phones*
- *Social Media*
- *Risk Assessment*
- *Recruitment and Selection*



- *Data Protection*
- *ICT & Computing Acceptable Use Agreement*

Further advice on safeguarding and child protection is available from:

- Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>
- Child Internet Safety <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>
- Statutory Guidance to Relationships, education and sex education (RSE) and health education (2025) <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- OFSTED publication on safeguarding during inspections <https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>
- UK Council for Child Internet Safety (UKCIS) guidance: <https://www.gov.uk/government/publications/education-for-a-connected-world>
- Teaching Regulation Agency: <https://teacherservices.education.gov.uk/>
- NSPCC Stages of typical sexual development/behaviour by age: <https://learning.nspcc.org.uk/child-health-development/sexual-behaviour>

Additional advice and support

Abuse

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website

Bullying

- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>
- [Preventing and Tackling Bullying](#) - DfE advice
- [Cyber bullying: advice for headteachers and school staff](#) - DfE advice

Pupils missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

Pupils with family members in prison

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

- [Trafficking: safeguarding children](#) - DfE and HO guidance

Child Sexual Exploitation

- [CSA Resources](#)



Drugs

- [Drugs: advice for schools](#) – DfE and ACPO advice
- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website

Honour Based Abuse

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance

Health and Well-being

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - PSHE Association
- [Medical-conditions: supporting children at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

Homelessness

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

Private fostering

- [Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

- [Prevent duty guidance](#) - Home Office guidance
- [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

Upskirting

- [Upskirting know your rights](#) – UK Government

Violence

- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Serious violence strategy](#) - Home Office Strategy

Advice for governing bodies/proprietors and senior leaders

- [Childnet](#) - provide guidance for schools on cyberbullying
- [Educateagainsthate](#) - provides practical advice and support on protecting pupils from extremism and radicalisation
- [London Grid for Learning](#) - provides advice on all aspects of a school or college's online safety arrangements
- [NSPCC](#) - provides advice on all aspects of a school or college's online safety arrangements
- [Safer recruitment consortium](#) - "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective

(Willington School reserves the right to update all policies on a regular basis)



- [Searching screening and confiscation](#) - is departmental advice for schools on searching pupils and confiscating items such as mobile phones
- [South West Grid for Learning](#) - provides advice on all aspects of a school or college's online safety arrangements
- [Use of social media for online radicalisation](#) - a briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on [Sharing nudes and semi nudes](#) and [using-external-visitors-to-support-online-safety-education](#)

Remote education, virtual lessons and live streaming

- [Case studies](#) - on remote education practice are available for schools to learn from each other
- [Departmental guidance on safeguarding and remote education](#) - including planning remote education strategies and teaching remotely
- [National cyber security centre](#) - guidance on choosing, configuring and deploying video conferencing
- [National cyber security centre](#) - guidance on how to set up and use video conferencing
- [UK Safer Internet Centre](#) - guidance on safe remote learning

Support for Pupils

- [Childline](#) - free and confidential advice
- [UK Safer Internet Centre](#) - report and remove harmful online content
- [CEOP](#) - advice on making a report about online abuse

Parental support

- [Childnet](#) - toolkit to support parents and carers of pupils of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia](#) - provide independent reviews, age ratings, & other information about all types of media for pupils and their parents
- [Government advice](#) - about protecting pupils from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Internet Matters](#) - provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help pupils get the most out of their digital world
- [London Grid for Learning](#) - provides support for parents and carers to keep their pupils safe online, including tips to keep primary aged pupils safe online
- [Lucy Faithfull Foundation StopItNow](#) - resource can be used by parents and carers who are concerned about someone's behaviour, including pupils who may be displaying concerning sexual behaviour (not just about online)
- [Shore Space](#) - a safe space for teenagers worried about sexual behaviour
- [National Crime Agency/CEOP Thinkuknow](#) - provides support for parents and carers to keep their pupils safe online
- [Parentzone](#) - provides help for parents and carers on how to keep their pupils safe online
- [UK Safer Internet Centre](#) - provide tips, advice, guides and other resources to help keep pupils safe online



Annex A

Attendance

Good attendance is fundamental to safeguarding and promoting the welfare of pupils. Willington recognises that persistent absence, frequent lateness, unexplained absence, part-time timetables or patterns of absence may be indicators of abuse, neglect, exploitation, mental health concerns or other safeguarding issues.

Attendance is carefully monitored throughout each term, and any concerns are considered alongside other safeguarding information to ensure that pupils receive appropriate support and protection.

Where attendance concerns are identified, Willington works closely with pupils, parents/carers and, where appropriate, external agencies to provide individualised support and help improve attendance and remove barriers to learning.

Staff should remain professionally curious and report any concerns promptly to the DSL. Further information is available in the School's Attendance Policy and Keeping Children Safe in Education (2026).

Designated Safeguarding Lead

Willington has a DSL and 3 Deputy DSL's.

The DSL is: **Eleanor Henery**

The Deputy Designated Safeguarding Leads are: **Keith Brown, Ruth Henson and Natalie Fox.**

A trained DSL (or deputy) will be available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for coordinating safeguarding on site. This might include updating and managing access to child protection online management system, for example My Concern and liaising with the offsite DSL (or deputy) and as required liaising with pupils' social workers where they require access to pupils in need and/or to carry out statutory assessments at Willington.

All school named staff and volunteers will have access to a trained DSL (or deputy). On each day staff on site will be made aware of who that person is and how to contact them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done in person, remotely or may be virtual, for example via Zoom or Skype.

If the DSL is nearing or is over the 2 yearly statutory update, for these emergency provisions, that DSL may continue in their duty.

If a school does not have a DSL due to sickness or staff in self-isolation, assistance can be sought from a nearby school or cluster group of schools to provide DSL cover.

The DSL will ensure that all CP records relating to a pupil attending another setting will be communicated and transferred if necessary. It is recommended that both settings discuss any concerns involving a



Vulnerable Child. This will include access to CP Plans, EHCPs or Personal Education Plan if the pupil is “Looked After”.

Reporting a concern

All staff must be particularly vigilant where pupils have additional needs, including Special Educational Needs and Disabilities (SEND), or communication difficulties, and should be alert to any signs, disclosures, drawings or body maps which may indicate that a pupil has suffered, or is at risk of suffering, harm.

Any drawings, body maps or written records must be signed, dated and timed, and passed immediately to the Designated Safeguarding Lead or a Deputy DSL together with the original record of concern or disclosure.

If a member of staff receives a disclosure or has any safeguarding concern, they must follow the procedures set out in this Child Protection and Safeguarding Policy. All safeguarding concerns must be reported immediately to the DSL or, in their absence, a Deputy DSL.

Willington ensures that there is always a trained member of the Safeguarding Team available on the School site during the school day. The DSL will receive immediate cover from senior colleagues where necessary to enable them to respond promptly to safeguarding concerns. The DSL monitors safeguarding communications and emails regularly, including during school holidays, and a dedicated DSL mobile telephone is available should staff, parents or external agencies need to make urgent contact.

If any member of staff has a concern about the conduct of an adult working in or on behalf of the School, they must report this immediately to the Headteacher. If the concern relates to the Headteacher, it must be reported to the Chair of Governors. The Headteacher (or Chair of Governors, where appropriate) will actively consider whether the concern meets the threshold for consultation with, or referral to, the Local Authority Designated Officer (LADO) and will seek advice from the LADO where appropriate before any internal investigation is undertaken.

Child on Child Abuse

Any reports of child on child abuse must be followed up as set out in Part 5 of Keeping Children Safe in Education 2026 and in the specific section of the Child Protection and Safeguarding Policy.

School staff have received training on “child on child” abuse in accordance with part 5 of Keeping Children Safe in Education 2026. All reports of incidents must be reported to the DSL, and subsequently the Merton Children's Safeguarding Partnership in accordance with the multi-agency safeguarding arrangements.

School staff therefore need to be mindful of any conflicts that may arise or the identification of vulnerable pupils.

Safeguarding Training and Induction

Any new staff recruited during these emergency procedures will require safeguarding induction in line with Keeping Children Safe in Education 2026 which includes receiving:

- Part 1 in full of KCSIE 2026 and annex A
- A copy of the Child Protection and Safeguarding Policy,
- A copy of the Staff Code of Conduct/ Staff Behaviour Policy
- A copy of Willington's Behaviour Policy, and
- The Safeguarding response to pupils who are missing education.

(Willington School reserves the right to update all policies on a regular basis)



- The induction will also include a meeting with the DSL to understand his/ her role.

All staff will be made aware of safeguarding updates during the emergency period.

Safer Recruitment

Willington is committed to ensuring that robust safer recruitment procedures are followed to help deter, identify and reject people who may pose a risk to pupils. All recruitment processes are carried out in accordance with Part Three of Keeping Children Safe in Education (2026), the Equality Act 2010, the Public Sector Equality Duty, where applicable, and all relevant employment legislation.

All applicants, staff, governors, contractors, agency workers, self-employed individuals and volunteers are subject to appropriate safeguarding and pre-appointment checks relevant to their role. These include verification of identity, right to work, qualifications, employment history, references, prohibition checks (where applicable), criminal record checks and any other checks required by law or statutory guidance.

Willington will ensure that no individual who is unsuitable to work with children is permitted to work at, or have access to, pupils.

Volunteers

Willington undertakes an appropriate assessment for all volunteers to determine the level of safeguarding checks required, taking account of the nature of the role, the frequency of volunteering and whether the role constitutes regulated activity (in a role that involves teaching, training, instructing or supervising children on more than 3 days in a 30-day period, or overnight).

Volunteers undertaking regulated activity must have an Enhanced Disclosure and Barring Service (DBS) certificate, including Children's Barred List information, before commencing their role. Where volunteers undertake regulated activity across more than one education setting, Willington will work with the other settings to agree which organisation will obtain the Enhanced DBS check with children's barred list information. The volunteer will provide this information to each setting as required. Volunteers who are not engaged in regulated activity will be subject to an appropriate risk assessment to determine whether an Enhanced DBS certificate is required.

Willington regularly reviews all volunteer roles, including regular parent helpers, sports coaches, reading volunteers, listeners and other volunteers, to ensure that appropriate safeguarding checks remain in place. The Single Central Record (SCR) and volunteer records are maintained and updated accordingly.

Under no circumstances will a volunteer undertake regulated activity without the required safeguarding checks having been completed.

Self-employed Individuals

Where Willington engages self-employed individuals, such as peripatetic music teachers, sports coaches or other specialist instructors, Willington will ensure that the appropriate safeguarding and recruitment checks are undertaken in accordance with Keeping Children Safe in Education (2026) before they begin working with pupils.

Work Experience



Where Willington provides work experience placements or hosts work experience students, appropriate safeguarding arrangements, supervision and recruitment checks will be undertaken in accordance with Keeping Children Safe in Education (2026) and the nature of the role being undertaken.

Single Central Record

Willington maintains an accurate and up-to-date Single Central Record (SCR) in accordance with Keeping Children Safe in Education (2026). The SCR records all recruitment and vetting checks required by statutory guidance for staff, governors, volunteers and other relevant individuals.

Willington uses the Department for Education's Check a Teacher's Record Service to undertake prohibition from teaching, Section 128 and other statutory checks where required.

The Headteacher, Bursar and other appropriate members of the Senior Leadership Team regularly review the SCR to ensure it remains accurate, complete and compliant.

Movement of Staff

Where staff work across more than one educational setting, Willington will ensure that all appropriate safeguarding checks have been completed and that relevant safeguarding information is shared appropriately between settings in accordance with statutory guidance and safer recruitment requirements.

Referrals to Professional Bodies

Willington will fulfil its legal duty to make referrals to the appropriate external agencies where the statutory threshold is met.

Any teacher who is dismissed, or who would have been dismissed had they not resigned, because of serious misconduct will be referred to the Teaching Regulation Agency.

Where Willington removes, or would have removed, a member of staff or volunteer from regulated activity because they have harmed a pupil, posed a risk of harm to a pupil, or otherwise met the legal referral criteria, Willington will make a referral to the Disclosure and Barring Service in accordance with its statutory duties.

Online Safety

Willington is committed to providing a safe environment for pupils both online and offline. Pupils use technology as part of their learning and are taught how to stay safe online through the curriculum and age-appropriate safeguarding education. The School has appropriate filtering and monitoring systems in place to help ensure that online content accessed through the School's IT network is suitable for pupils' age and stage of development. These protections also apply to pupils accessing the School's network remotely where appropriate.

The School regularly reviews its online safety arrangements in line with statutory guidance and will ensure that any new digital platforms, communication systems or online learning tools are appropriately risk assessed and comply with data protection legislation. The Data Protection Officer will be consulted where appropriate, including where a Data Protection Impact Assessment is required.



Willington makes use of high-quality online safety resources, including those provided by the London Grid for Learning (LGfL), to support pupils, staff and families in developing safe and responsible online behaviours.

Annex B

Willington Prep – Keeping You Safe

Your voice matters at Willington

What does safeguarding mean?

Safeguarding means **keeping children safe**, cared for and listened to.

At Willington, safeguarding means:

- Helping you if something is worrying you
- Protecting you from harm, both in school and outside school
- Making sure you feel safe enough to learn and enjoy school
- Listening to you and taking you seriously

Your safety always comes first.

Who is responsible for keeping you safe?

Everyone at Willington helps to keep children safe.

There are also special adults whose job is to help if something feels wrong:

- The Designated Safeguarding Lead (DSL)
 - Deputy DSLs
- Teachers and other trusted adults

You can talk to **any adult in school** if you are worried.



What kinds of things are we worried about?

Sometimes children may feel unsafe because of:

- Bullying or unkind behaviour
- Being hurt physically or emotionally
- Being touched in a way that makes them uncomfortable
- Being frightened, ignored or made to feel worthless
- Things that happen online, including messages, images or games
 - Not being cared for properly

These things are **never your fault**.

What should you do if something worries you?

If something does not feel right:

- Tell an adult you trust as soon as you can
- You can talk to your teacher, another member of staff or your parents
 - You can ask to speak privately

You will not get into trouble for speaking up.

What if the worry is about someone else?

If you are worried about a friend:

- Tell an adult, even if your friend asked you not to
- You are helping to keep them safe



- Keeping secrets about safety can make things worse

Telling an adult is the right thing to do.

What happens when you tell an adult?

When you share a worry:

- An adult will listen carefully
- They will take you seriously
- They will not promise to keep it a secret
- They will share the information only with people who need to help

This is done to protect you, not to get anyone into trouble

What about online safety?

Safeguarding also includes keeping you safe online.

This means:

- Telling an adult if something online makes you uncomfortable
 - Not sharing personal information
 - Not being asked to keep online secrets
 - Saving evidence and reporting worries

If something online worries you, tell an adult straight away.

Will adults always tell parents?

Usually, school works with parents to help keep children safe.

However, if telling a parent might make a situation worse or unsafe, school may need to get help from other adults whose job it is to protect children.



This is always done to keep children safe.

What if a child feels scared to speak?

Some children find it hard to talk about worries.

At Willington:

- You will be listened to
- You will be believed
- You will be supported
- Your feelings matter

You will never be blamed for speaking up.

Our promise to you

At Willington, we promise:

- To listen to you
- To protect you
- To take your worries seriously
- To help you feel safe at school and beyond

It is always okay to ask for help.

Review period: Annual

Reviewed by: DSL

Eleanor Henery - (DSL and EYFS), R. Henson – (Deputy DSL), N. Fox - (SENCO Deputy DSL) and K. Brown - (Deputy DSL)

Katy Morgan (Designated Child Protection Governor)

