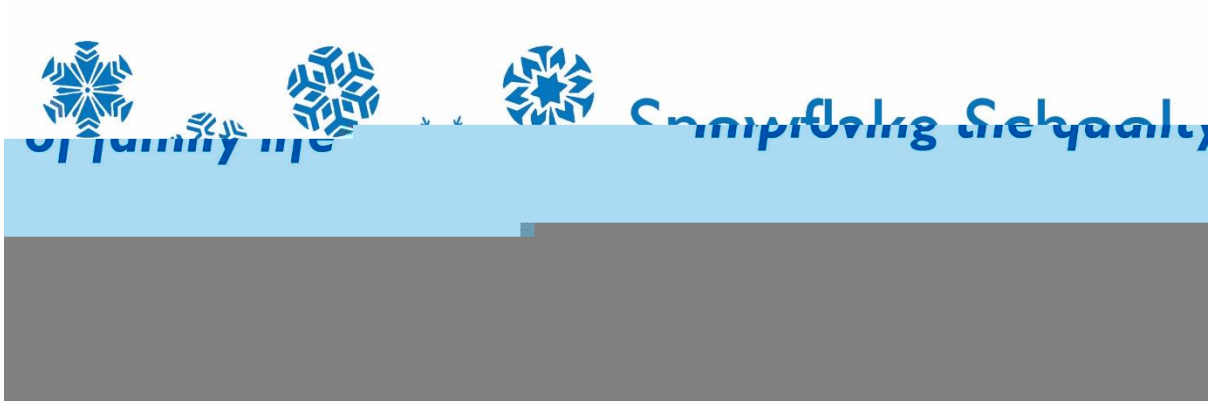

Child Protection & Safeguarding Policy

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1 AIMS

1.1 Snowflake School (the School) aims to ensure that every child at the school is safe and protected from harm. This includes:

1.1.1. Taking appropriate action in a timely manner to safeguard and promote children's welfare;

1.1.2. Ensuring staff, including volunteers are aware of their statutory responsibilities with respect to safeguarding; and

1.1.3. Ensuring staff, including volunteers are properly trained in recognising and reporting safeguarding issues.

2 DEFINITIONS

2.1 Safeguarding and promoting the welfare of children means:

2.1.1 Protecting children from maltreatment;

2.1.2 Preventing impairment of children's health or development;

2.1.3 Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

2.1.4 Taking action to enable all children to have the best outcomes.

3 EQUALITY STATEMENT

3.1 When making any decision under this policy it is particularly important that each pupil is treated as an individual having regard to their needs. It is particularly important that if a child has a disability (or special educational needs) that these are appropriately taken into account. For children with disabilities, it is important that reasonable adjustments are actively considered. Further, when applying this policy any protected characteristics (such as race, disability, sexual orientation) are taken into account. Any concerns about discrimination should be addressed urgently with a senior member of staff or the Headteacher. Further, when making any decisions it is important to treat pupils fairly which means making sure that they understand what they have done and having the opportunity to express their views. This reflects the emphasis in KCSIE 2026 on pupil voice in safeguarding practice, ensuring children are consulted and their views inform decisions affecting them.

3.2 The School will review and update our RSHE and related policies in line with any new statutory DfE guidance on Relationships, Sex and Health Education and guidance on gender questioning when it is published, and we will communicate any changes to staff and parents

4 ROLES AND RESPONSIBILITIES

4.7A Safeguarding Leadership Structure

The School operates a distributed safeguarding leadership model to ensure safeguarding expertise, oversight and decision-making are available across all areas of the School.
The Designated Safeguarding Leads (DSLs) share overall responsibility for safeguarding and child protection and work collaboratively to oversee safeguarding practice, referrals, record-keeping, quality assurance and multi-agency working.
Deputy Designated Safeguarding Leads (DDSLs) support the DSLs and may undertake safeguarding activities, including referrals and safeguarding decision-making, when acting under the direction of, or in the absence of, a DSL.
The Headteacher retains strategic oversight of safeguarding across the School and receives regular safeguarding updates from the DSL team. The Headteacher does not replace the operational role of the DSL but ensures safeguarding systems, processes, resources and leadership arrangements remain effective.

4.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees in the school and is consistent with the procedures contained in the statutory guidance **Keeping Children Safe in Education,** (DfE, Sept 2026) ("KCSIE") and of the boroughs shown in appendix 1. Our policy and procedures also apply to extended School and offsite activities.

4.2 All staff and volunteers, working in or on behalf of the school have a responsibility to provide a safe environment in which children can learn, and all staff should be prepared to identify children who may benefit from Family Help.

4.3 All of the above people will be aware of our systems within the school which support safeguarding and these will be explained to them as part of a staff/volunteer induction. This will include:

4.3.1 The child protection policy;

4.3.2 The behaviour policy;

4.3.3 The codes of conduct required of our staff and those working for the school; and

4.3.4 The safeguarding response to children who go missing from education; and the identity of the designated safeguarding lead ("DSL") and deputy designated safeguarding leads ("DDSL")

4.4 All staff and volunteers will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff and volunteers will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

4.4.1 In accordance with Keeping Children Safe in Education 2026, all staff, regardless of role, must read and understand Part One of KCSIE in full. Staff must understand how safeguarding responsibilities apply to their role and know how to act on concerns without delay.

4.5 All staff and volunteers will be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

4.5.1 The School recognises that safeguarding is a shared responsibility and will work proactively with children's social care, health services, police, local authorities and other relevant agencies to promote the welfare of children.

4.5.2 The School will participate in Family Help, Child in Need and Child Protection processes where required and will contribute to assessments, strategy discussions, plans, meetings and reviews.

4.5.3 Staff must understand that effective safeguarding requires timely information sharing and professional curiosity. Concerns should not be viewed in isolation, and consideration should always be given to the wider context of a child's life and experiences.

4.6 All staff and volunteers will know what to do if a child tells them he/she is being abused or neglected. They will 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 deputy) and children's social care. Staff and volunteers will never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

4.7 The DSL and DDSL takes lead responsibility for child protection and wider safeguarding, including online safety. They will be given the reasonable time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

4.8 During term time, the DSL will be available during School hours for staff and volunteers to discuss any safeguarding concerns. Out of School hours the Headteacher can be contacted on:

Tel: 07875653597

4.10 **The DSL will:**

4.10.1 Refer cases of suspected abuse to the local authority children's social care as required;

4.10.2 Support staff who make referrals to local authority children's social care;

4.10.3 Refer cases to the Channel programme where there is a radicalisation concern as required;

4.10.4 Support staff who make referrals to the Channel programme;

4.10.5 Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;

4.10.6 Refer cases where a crime may have been committed to the Police as required; and

4.10.7 Liaise with local authority case managers and designated officers for child protection concerns as appropriate. They will act as a point of contact for others.

The full responsibilities of the DSL are set out in his/her job description.

4.11 **The Board of Trustees will:**

4.11.1 Approve this policy at each review and hold the Headteacher to account for its implementation.

4.11.2 Ensure compliance with Working Together to Improve School Attendance and recognise that children who are persistently absent, severely absent, or missing from education may be at increased risk of abuse, neglect, exploitation, child criminal exploitation (CCE), child sexual exploitation (CSE), mental health difficulties, radicalisation and other safeguarding concerns. Attendance information will be considered as part of the school's wider safeguarding arrangements.

4.11.3 Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the trustees. This is always a different person from the DSL; and

4.11.4 Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

4.11.5 The chair of trustees will act as the 'case manager' in the event of an allegation of abuse made against the Headteacher, where appropriate (see appendix 4).

4.11.6 Have a designated trustee responsible for oversight of safeguarding who will receive adequate training to effectively challenge the safeguarding practice in the school.

4.11.6.1 This trustee will regularly meet with the DSL to audit school safeguarding practice and provide appropriate challenge and support to the DSL.

4.11.7 Safeguarding Governance and Monitoring

Trustees recognise that effective safeguarding governance requires both support and challenge.

Trustees will:

- Receive regular safeguarding reports from the DSL team.
- Monitor safeguarding trends, themes, training and compliance.
- Receive information regarding serious incidents, where appropriate.
- Undertake safeguarding monitoring activities and visits.
- Review safeguarding arrangements annually.
- Seek assurance that safeguarding systems and practices are effective across all School sites.

The designated safeguarding trustee will meet regularly with safeguarding leaders and provide appropriate challenge regarding safeguarding practice, decision-making and outcomes for pupils.

4.12 **The Headteacher, who is responsible for the implementation of this policy, will:**

4.12.2. Ensure that staff (including temporary staff) and volunteers are informed of this policy as part of their induction;

4.12.3. Communicate this policy to parents when their child joins the school and via the school website;

4.12.4 Ensure that all staff undertake appropriate safeguarding and child protection training and update this regularly;

4.12.5 Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 4); and

4.12.6 Ensure the relevant staffing ratios are met.

4.13 **Staff Code of Conduct**

4.13.1 All staff must adhere to the Staff Code of Conduct, setting clear expectations for professional behaviour and safeguarding responsibilities. This includes:

4.13.1.1 Maintaining appropriate boundaries with pupils at all times.
4.13.1.2 Using technology and social media responsibly and in line with school policy.
4.13.1.3 Acting as positive role models and promoting the welfare of children.
4.14.1.4 Reporting any concerns about their own or others' conduct promptly to the Headteacher or DSL in accordance with the school's procedure as set out in this policy.

4.13.2 Breaches of the Staff Code of Conduct will be addressed under the school's disciplinary procedures and may lead to referral to external agencies, including the Local Authority Designated Officer (LADO), the Disclosure and Barring Service (DBS), or the Teaching Regulation Agency where appropriate.

5 TRAINING

5.1 All staff:

5.1.1 Will receive training on recognising and reporting low-level concerns about staff behaviour, ensuring they understand the difference between low-level concerns, allegations that meet the harm threshold, and whistleblowing. They will also receive safeguarding and child protection training at induction to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children partnership;

5.1.2 Will be required to read and understand Part One of Keeping Children Safe in Education 2026 in full, regardless of their role within the school

5.1.3 Will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annual;

5.2 The DSL and DDSL will undertake child protection and safeguarding training at least every 2 years on top of the training required of other staff.

5.3 All trustees receive training about safeguarding, to make sure they have the knowledge and information needed to perform their **functions and understand their responsibilities.**

6 RECRUITMENT – INTERVIEW/APPOINTMENT PANELS

6.1 Relevant, proportionate and lawful checks are undertaken on all adults who regularly work at, or visit the school, including Disclosure and Barring Service (DBS) checks prior to appointment as set out in the KCSIE.

6.2 At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the department for education's statutory guidance, keeping children safe in education, and be in line with local safeguarding procedures;

6.3 All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues; and

6.4 We check the identity of any visitor before providing admittance into the school and all visitors must sign-in (entrance hall). People undertaking work on site who do not have DBS clearance (as it is not pertinent to their employment) will not have unaccompanied access to children. We endeavour to ensure that any work at School site is undertaken out of School operating hours. All other visitors to the school will always be accompanied by staff when they are in the school. Our School has an electronic sign in system for all regular visitors and volunteers. This is available in the school's entrance hall.

6.5 We will also consider and verify:

6.5.1 The applicants identify;

6.5.2 The applicant's right to work in the UK;

6.5.3 Verification of professional qualifications required by the school for the job the applicant has applied for;

6.5.4 Receipt of two references satisfactory to the school; and

6.5.5 For teaching position confirmation that the applicant is not subject to a prohibition notice from the National School of Teaching and Leadership; and

6.5.6 Pupils on work placements will only be accepted after a visit from a member of staff from their School/college or after their college has formally written to our School. Pupils will never be allowed to work alone with any of our pupils and will always be accompanied by staff.

6.6 Where the applicant is a considered a potential risk to working with Children, a decision will be taken by the Headteacher and/or Chair of Trustees, following completion of a documented risk assessment, as to whether to progress the appointment or not.

6.7 The School records pre-employment checks on the Single Central Record (SCR). When engaging agency or supply staff, the school will obtain written confirmation that the agency has completed the required checks and will record this on the SCR.

7 VISITORS

7.1 We check the identity of any visitor before providing admittance into the school and all visitors must sign-in (entrance hall). People undertaking work on site who do not have DBS clearance (as it is not pertinent to their employment) will not have unaccompanied access to children. We endeavour to ensure that any work at School site is undertaken out of School operating hours. All other visitors to the school will always be accompanied by staff when they are in the school. Our School has a visitors' handbook that is shared with all visitors and volunteers. This is available in the school's entrance hall.

8 CONFIDENTIALITIES

8.1 The School will make every effort to maintain confidentiality and guard against unwanted publicity whilst any allegations are investigated or considered. However, confidentiality must never override safeguarding, and information sharing is mandatory where risk exists.

8.2 The School processes personal data collected during informal complaints and the formal complaints procedure in accordance with its Data Protection Policy.

8.3 Confidentiality is also addressed in this policy with respect to record-keeping in section 17, and allegations of abuse against staff in appendix 4.

8.4 **Information Sharing**

8.4.1 The School recognises that data protection legislation is not a barrier to information sharing where failure to share information would place a child at risk.

8.4.2 Staff should be proactive in sharing information with the DSL, children's social care, police and other safeguarding partners where it is necessary, proportionate and lawful to do so.

8.4.3 Consent is not required where there is a lawful basis to share information in order to safeguard or promote the welfare of a child. Where appropriate, the school will be transparent with children and families about information sharing decisions unless doing so would place a child at increased risk of harm.

8.4.4 All information sharing decisions should be recorded, including the rationale, information shared, recipient and outcome

8.4.5 Quality Assurance of Safeguarding Records
The School recognises that high-quality safeguarding records are essential in protecting children. Safeguarding records will be subject to regular quality assurance and audit by the DSL team. This will include review of referrals, chronologies, actions, decision-making and case progression. Where learning points or areas for improvement are identified, these will be addressed through supervision, training, procedural changes or leadership oversight.

9 RECOGNISING ABUSE AND TAKING ACTION

9.1 Staff, volunteers and trustees must follow the procedures set out below in the event of a safeguarding issue.

9.2 If a child is in immediate danger:

9.2.1 Make a referral to children's social care and/or the police immediately. Anyone can make a referral. Tell the DSL as soon as possible if you make a referral directly.

9.2.2 Report the matter to the police on 999 (or 101 if a crime has been allegedly committed).

9.2.3 Or report the matter to the child's local council by following the link below:

https://www.gov.uk/report-child-abuse-to-local-council

9.2.4 The school will work alongside a lead social worker where one is involved. Where a certain serious report is made, the school will pass information onto the police.

9.3 **If a child makes a disclosure to you report it immediately to the DSL.** If a child discloses a safeguarding issue to the school, it will endeavour to listen to the child and offer support. It will explain the next steps but cannot promise confidentiality. A record will be made of the disclosure and passed onto the DSL.

9.4 If **you discover that Female Genital Mutilation ("FGM") has taken place, or a pupil is at risk of FGM**

9.4.1 The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

9.4.2 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3.

9.4.3 **Any tutor/teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and tutor/teachers will face disciplinary sanctions for failing to meet it. They should also report it as soon as possible to the DSL.

9.4.4 The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

9.4.5 **Any other member of staff** e.g. a volunteer, who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our safeguarding procedures.

9.4.6 **Any member of staff** or volunteer who suspects a pupil is *at risk* of FGM or discovers that a **pupil aged 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

9.5 **If you have <u>concerns</u> about a child (as opposed to a child being in immediate danger)**

9.5.1A Autism, Communication Differences and Safeguarding
The School recognises that autistic children and young people may communicate distress, anxiety, abuse, neglect, exploitation or trauma in different ways.
Changes in behaviour, emotional regulation, attendance, engagement, communication, self-injurious behaviour, presentation, wellbeing or interaction with others may indicate an unmet safeguarding need.
Staff must maintain professional curiosity and consider whether any significant change in a pupil's presentation may be linked to a safeguarding concern. Staff should not assume that behaviours are solely attributable to autism, learning needs, communication differences or diagnosed conditions.
Safeguarding concerns should always be discussed with the DSL or DDSL and recorded in accordance with the School's safeguarding procedures.

9.5.1 We recognise that autistic children and Young People with additional needs are more vulnerable to safety, abuse and welfare issues or may have previous experience of trauma.

Autistic children and Young People have difficulty with social communication and social interaction, their ability to recognise, understand or report potential or actual signs of harm or abuse will most likely be affected to varying degrees. Despite levels of intelligence, if their social understanding is in any way impaired, how they process and understand certain situations will undoubtedly be a barrier in being able to advocate and protect themselves.

The nature of autism itself can put people at risk. High levels of stress and anxiety are common, as are self-injurious behaviour, the desire to be alone, behaviour which can be perceived as challenging to others as well as experiencing sensory challenges and / or dysregulation.

This requires staff to maintain the difficult balance between behaviours which may be due to their autism and how it presents uniquely in each individual, verses a potential sign of harm or abuse. It is therefore essential that staff share any concerns regarding a child or Young Person's presentation, welfare or safety with the DSL or DDSL.

9.5.2 Where a member of staff or volunteer has concerns about a child, they will speak to DSL and report the details of the concern on the school's cloud-based safeguarding platform 'MyConcern' (https://www.myconcern.education/). Either the member of staff or the DSL may make a referral following this to the local authority children's social care directly.

9.5.3 **Local contact details are given in appendix 2, or can be found at:**

https://www.gov.uk/report-child-abuse-to-local-council

9.5.4 Where a referral is made, the local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

9.5.5 If they decide to take action, the school will be informed and will keep the child's circumstances under review and re-refer it if appropriate. The school will also put the child's interests first.

9.5.6 Where the social worker takes no action, the school may consider Family Help assessments and accesses to other support. They will continue to review the child's circumstances.

9.5.7 You can also contact the charity **NSPCC on 0808 800 5000** if you need advice on the appropriate action.

9.6 **Family Help**

9.6.1 Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. If Family Help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

9.6.1.1. Staff should be alert to children and families who may benefit from Family Help services and should discuss concerns with the DSL at the earliest opportunity. Early intervention remains central to safeguarding practice and support should be offered before concerns escalate wherever possible

9.6.2 The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

9.6.2.1Family Help is particularly useful for a child who:

9.6.2.1.1 is disabled and has specific additional needs;

9.6.2.1.2 has special educational needs (whether or not they have a statutory Education, Health and Care Plan);

9.6.2.1.3 is a young carer;

9.6.2.1.4 is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

9.6.2.1.5 is frequently missing/goes missing from care or from home;

9.6.2.1.6 is at risk of modern slavery, trafficking or exploitation;

9.6.2.1.7 is at risk of being radicalised or exploited;

9.6.2.1.8 is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

9.6.2.1.9 is misusing drugs or alcohol themselves;

9.6.2.1.10 has returned home to their family from care; and

9.2.2.1.11 is a privately fostered child.

9.6.3 **Attendance, Absence and Children Missing Education**
9.6.3.1 The School recognises that attendance is an important safeguarding indicator. Children who are persistently absent, severely absent, missing from education, or who experience unexplained absences may be at risk of harm, abuse, neglect, exploitation or other safeguarding issues.
9.6.3.2 Staff must report attendance concerns promptly to the DSL.
9.6.3.3 The DSL will work with attendance staff, parents, carers, external agencies and the Local Authority to identify barriers to attendance and safeguard pupils as appropriate.
9.6.3.4 Attendance information will form part of the school's safeguarding monitoring and risk assessment processes and may contribute to decisions regarding Family Help, Child in Need and Child Protection referrals.

9.6.3.5 - **Attendance as a Safeguarding Indicator**
The School recognises that prolonged absence, emotionally based school avoidance, medically related absence, part-time timetables and patterns of irregular attendance may indicate safeguarding concerns or unmet needs.
Attendance concerns will be reviewed alongside safeguarding information and risk assessments to ensure that underlying welfare concerns are appropriately identified and addressed.

9.7 **Concerns about extremism**

9.7.1 Where there is a concern immediately inform DSL, who will consider the level of risk and decide which agency to make a referral to. This could include Channel or the local authority children's social care team.

9.7.2 The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that School staff and trustees can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, **call 999** or the confidential anti-terrorist hotline on: **0800 789 321.**

9.8 **Concerns about a staff member, supply staff or volunteer**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor)

posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of trustees.

The headteacher/chair of trustees will then follow the procedures set out in appendix 4, if appropriate.

9.8.1 You can also discuss any concerns about any staff member or volunteer with the DSL.

9.8.2 The Headteacher/chair of trustees will then follow the appropriate procedures.

9.9 **Allegations of abuse made against other pupils**

9.9.1 We recognise that children are capable of abusing their peers. Girls are often more likely to be victims of this abuse than boys. Abuse will never be tolerated or passed off as "banter" or "part of growing up".

9.9.2 This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

9.9.3 Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

9.9.4 If a pupil makes an allegation of abuse against another pupil the school will tell the DSL and record the allegation. All allegations will be treated confidentially.

9.9.5 The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

9.9.6 The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.

9.9.7 The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

9.9.8 We will minimise the risk of peer-on-peer abuse by:

9.9.8.1 Challenging any form of derogatory or sexualised language or behaviour;

9.9.8.2 Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;

9.9.8.3 Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent;

9.9.8.4 Ensuring pupils know they can talk to staff confidentially. We ensure our children

9.9.8.5 Know that there are adults in the school whom they can approach if they have any worries or concerns, and this is signposted around School; and

9.9.8.6 Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

9.9.9 Staff will ensure that they are:

9.9.9.1 making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

9.9.9.2 not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and

9.9.9.3 challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

9.9.10 **Alternative Provision**

9.9.10.1 Where pupils attend alternative provision, the school remains responsible for safeguarding.

9.9.10.2 Written confirmation will be obtained from the provider that:

9.9.10.2.1 All staff working with pupils have undergone appropriate safeguarding checks, including enhanced DBS checks and barred list checks where applicable.
9.9.10.2.2 The provider has a current safeguarding policy that aligns with statutory guidance and includes procedures for managing allegations, reporting concerns, and safer recruitment.
9.9.10.2.3 The provider has appropriate supervision arrangements and staff-to-pupil ratios in place.
9.9.10.2.4 The provider has robust online safety measures, including filtering and monitoring systems, and complies with DfE standards.
9.9.10.2.5The provider has trained staff who understand their safeguarding responsibilities, including Prevent duty and reporting mechanisms.

9.9.10.3 The school will:

9.9.10.3.1 Record the address and supervisory arrangements for any alternative or satellite site where the pupil will be based.

9.9.10.3.2 Ensure it knows where the child is during school hours and maintain regular contact with the provider.

9.9.10.3.3 Review the placement regularly (at least half-termly) and immediately if a safeguarding concern arises.

9.9.10.3.4 Include the pupil in the school’s safeguarding monitoring systems and ensure the DSL maintains oversight of their welfare.

9.10 **Safeguarding Children with SEND and Additional Needs**

9.10.1 Children with SEND or disabilities can face additional safeguarding challenges. The school will provide staff with:

9.10.1.1 Training and Awareness

9.10.1.1.1 All staff will receive training on recognising signs of abuse and neglect in children with SEND, including how to identify subtle indicators that may differ from those in other pupils

9.10.1.2 Communication Support

9.10.1.2.1 We will ensure that pupils with SEND have accessible ways to express concerns, including the use of visual aids, communication devices, and trusted adults who understand their needs. KCSIE 2026 highlights the importance of adapting safeguarding approaches to ensure children with SEND can contribute their views. The school will evidence how pupil voice is captured for children with communication difficulties.

9.10.1.2.2 Pupil Voice and Communication
The School recognises that some pupils may be minimally speaking, non-speaking or experience difficulties communicating worries, concerns or experiences of harm.
The School will use a range of communication approaches appropriate to the individual needs of pupils, including visual supports, communication systems, augmentative and alternative communication (AAC), assistive technology, social stories and trusted adult relationships.
Safeguarding leaders will take reasonable steps to ensure that pupils are able to express their views, wishes and feelings and that these are considered when making safeguarding decisions.

9.10.1.3 Individual Risk Assessments

9.10.1.3.1 Safeguarding risk assessments will include SEND-specific considerations, such as dependency on adults for personal care, vulnerability to bullying, and online safety risks

9.10.1.4 Multi-Agency Collaboration

9.10.1.4.1 The DSL will work closely with parents, carers, and external professionals (e.g., speech and language therapists, occupational therapists) to ensure a coordinated approach to safeguarding

9.10.1.5 Curriculum Adaptation

9.10.1.5.1 Our RSHE and online safety education will be adapted to meet the needs of pupils with SEND, ensuring they understand boundaries, consent, and how to seek help.

9.11 **Mental Health and Safeguarding**

9.11.1 Mental health problems can indicate abuse or neglect. The DSL will ensure staff training on mental health awareness, including:

9.11.1.1 Recognising Signs: Staff will be trained to identify indicators of mental health difficulties that may signal safeguarding concerns, such as sudden changes in behaviour, withdrawal, self-harm, or expressions of hopelessness.
9.11.1.2 Staff Support: The school will ensure staff know how to access support for their own mental health and wellbeing, recognising the impact safeguarding responsibilities can have.
9.11.1.3 Online safety: Staff will be trained to recognise online misinformation and disinformation as potential safeguarding risks, in line with KCSIE 2026.

9.11.2 Early Intervention: The school will provide early support through pastoral care and liaise with external agencies where appropriate.
9.11.3 Referral Pathways: The DSL will maintain clear referral routes to specialist services, including CAMHS and local mental health support teams.
9.11.4 Curriculum Integration: Mental health education will be embedded in the curriculum to promote resilience and wellbeing.
9.11.5 Policy Alignment: Mental health considerations will be integrated into safeguarding risk assessments and all relevant policies.
9.11.6 **Mental Health and Safeguarding**
9.11.6.1 The School recognises that mental health concerns may be an indicator that a child has suffered or is at risk of abuse, neglect, exploitation or other adverse experiences.
9.11.6.2 Staff should not attempt to diagnose mental health conditions but should report concerns promptly to the DSL so that appropriate support, assessment or referral can be considered.
9.11.6.3 Staff should be particularly alert to persistent absence, self-harm, significant behavioural changes, withdrawal, risk-taking behaviour, anxiety, emotional dysregulation and signs of trauma.

10 NOTIFYING PARENTS

10.1 Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

10.2 If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

10.3 In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

11 ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

11.1 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:

11.1.1 Have robust processes in place, reviewed annually against the DfE's Filtering and Monitoring Standards (2026), to ensure the online safety of pupils. This includes risks from misinformation, disinformation, and emerging technologies such as generative AI.

11.1.2 Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

11.1.3 Set clear guidelines for the use of mobile phones for the whole school community

11.1.4 Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

11.1.5 CCTV surveillance systems operate at the school. Please refer to our CCTV policy for details which is available from the headteacher.

11.1.6 The School will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. We will also comply with the relevant sections, i.e. photographs and videoing, in the School's Child Protection Policy.

11.2 The 4 Key Categories of Risk

11.2.1 Our approach to online safety is based on addressing the following categories of risk:

11.2.2 Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

11.2.3 Contact – being subjected to harmful online interaction with other users, such as peer to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

11.2.4 Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

11.2.5 Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

11.3 **To meet our aims and address the risks above we will:**

11.4 Educate pupils about online safety as part of our curriculum. For example:

11.4.1 The safe use of social media, the internet and technology

11.4.2 Keeping personal information private

11.4.3 How to recognise unacceptable behaviour online

11.4.4 How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

11.5 Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

11.6 Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

11.7 Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

11.7.1 Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

11.7.2 Staff will not take pictures or recordings of pupils on their personal phones or cameras

11.8 Make all pupils, parents/carers, staff, volunteers and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

11.9 Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

11.10 Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation .Staff with the power to search phones include the Headteacher or staff directly authorised by the Headteacher.

11.11 Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

11.12 Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

11.13 Generative **AI and Emerging Digital Risks**
The School recognises emerging risks from generative AI and other new technologies. Trustees will ensure the school refers to the Department for Education's expectations for generative AI and that the school's filtering and monitoring arrangements are reviewed annually against DfE standards. An online safety risk assessment will be carried out each year (or sooner if there are new, identified risks)

11.14 **Filtering and Monitoring Standards**

11.14.1 The school will ensure filtering and monitoring systems meet the Department for Education (DfE) standards, including:

11.14.1.1 Annual Review: Conduct a documented review of filtering and monitoring arrangements at least once per year, or sooner if new risks emerge.

11.14.1.2 Age-Appropriate Filtering: Implement filtering that is appropriate to the age and developmental stage of pupils, blocking harmful content such as pornography, extremism, self-harm, and other illegal or inappropriate material.
11.14.1.3 Monitoring: Ensure robust monitoring systems are in place to identify and alert staff to safeguarding risks, including attempts to bypass filters.
11.14.1.4 Trustees Oversight: Provide Trustees with an annual report on the effectiveness of filtering and monitoring systems, including any incidents and remedial actions.
11.14.1.5 Compliance with DfE Standards: Align filtering and monitoring arrangements with the DfE's statutory guidance and expectations, including the standards for online safety published by the Department.
11.14.1.6 Responsibility and Escalation: Assign responsibility for managing filtering and monitoring to the DSL and IT lead, ensuring clear escalation routes for concerns.
11.14.1.7 Transparency and Communication: Inform staff, pupils, and parents about the school's filtering and monitoring approach and acceptable use policies.
11.14.1.8 Emerging Risks: Review and update systems to address new and emerging risks, including generative AI and other technologies, as part of the school's online safety risk assessment.

11.14.2 **Artificial Intelligence, Deepfakes and Digitally Altered Content**
11.14.2.1 The School recognises that artificial intelligence (AI), including generative AI, presents both educational opportunities and safeguarding risks.

11.14.2.2 Staff will be alert to safeguarding concerns arising from AI-generated content, including deepfake images, videos or audio recordings, online abuse, harassment, extortion, exploitation and misinformation.
11.14.2.3 Any concerns relating to AI-generated sexualised imagery, harassment, bullying or exploitation will be managed in accordance with the School's safeguarding procedures and relevant statutory guidance.
11.14.2.4 The School will review technological developments and update risk assessments, filtering and monitoring arrangements where required.
11.14.3 **Artificial Intelligence and Emerging Technologies**
The School recognises that artificial intelligence and emerging technologies create both opportunities and safeguarding risks. Staff will remain alert to risks including:

- AI-generated abuse or bullying.
- Deepfake images, audio or video.
- Online manipulation and exploitation.
- Misinformation and disinformation.
- Inappropriate use of AI systems by pupils or adults.

The School will review emerging risks as part of its online safety and safeguarding arrangements and update risk assessments where appropriate.

12 COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES (Including Low Level Concerns)

The school recognises the importance of creating a culture in which all concerns about adults working with children are shared responsibly and with the right person.

12.0 **Safeguarding Culture**
The School is committed to maintaining a strong safeguarding culture where the welfare of children is everyone's responsibility.
All staff are expected to:

- Act immediately on safeguarding concerns.
- Maintain professional curiosity.
- Respectfully challenge decisions where necessary.
- Escalate concerns if they believe appropriate action has not been taken.
- Recognise that safeguarding concerns can arise in any family, setting or circumstance.

The School promotes a culture of openness, transparency and accountability in which safeguarding concerns are welcomed, recorded and acted upon without delay.

12.1 **Low-Level Concerns About Staff**

A low-level concern is behaviour by a member of staff, volunteer or contractor that is inconsistent with the staff code of conduct but does not meet the harm threshold for referral to the Local Authority Designated Officer (LADO).

Examples of low-level concerns may include:

- Being overly friendly with pupils
- Showing favouritism towards a pupil
- Taking photographs of pupils on a personal device
- Using inappropriate language or humour
- Minor boundary breaches that are inconsistent with the Staff Code of Conduct

Low-level concerns should be reported to the Headteacher as soon as possible.

Where the concern relates to the Headteacher, it should be reported to the Chair of Trustees.

All low-level concerns will be:

- recorded in writing
- stored securely
- reviewed by the Headteacher (or Chair of Trustees if relating to the Headteacher)
- monitored to identify patterns of behaviour.

If a pattern of low-level concerns is identified, this may indicate a safeguarding risk, and the matter may be escalated in accordance with the school's procedures for managing allegations against staff.

Low-level concerns will be handled sensitively and in accordance with the school's staff disciplinary procedures.

12.2 **Complaints against staff**

12.2.1 Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 4).

12.2.2 We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

12.2.3 Our procedures for dealing with allegations will be applied with common sense and judgement.

12.3 **Suspension**

12.3.1 Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

12.3.2 Based on an assessment of risk, we will consider alternatives such as redeployment, providing an assistant, moving the child, temporary redeployment.

12.4 **Procedure for dealing with allegations**

12.4.1 In the event of an allegation that meets the criteria above, the Headteacher (or chair of trustees where the Headteacher is the subject of the allegation) – the 'case manager' – will take the steps detailed below.

12.4.2 Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including

whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.

12.4.3 Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

12.4.4 Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

12.4.5 **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

12.4.6 **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

12.4.7 **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in School and/or liaise with the police and/or children's social care services as appropriate.

12.4.8 Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.

12.4.9 Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

12.4.10 Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

12.4.11 Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

12.4.12 If the School is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

12.4.13 Where the police are involved, wherever possible the local authority will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

12.5 **Timescales**

12.5.1Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

12.5.2 If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

12.5.3 If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

12.6 Specific actions

12.6.1 **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

12.6.2 **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the School's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

12.6.3 **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

12.6.4 **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

13 TYPES OF ABUSE AND NEGLECT

13.1 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child

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

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

13.3 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

13.4 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

13.5 We are aware that because of the day-to-day contact with the children, School staff are well placed to observe the outward signs of harm, such as unexplained injuries, changes in behaviour or presentation, anxiety, withdrawal, low mood, deterioration in attendance, changes in communication, self-injurious behaviour, age-inappropriate sexualised behaviour, concerning online activity, neglect of personal care, hunger, tiredness, or any other indicators that a child may be at risk of abuse, neglect or exploitation. We, therefore, work hard to establish and maintain an environment where children feel secure, are encouraged to communicate, and are listened to; and ensure our children know that there are adults in the school whom they can approach.

13.6 We are aware that children who are significantly harmed or at risk of significant harm or who witness violence may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and have a sense of blame. Our School may be the only stable, secure and predictable

element in the lives of children at risk. When at School the child's behaviour may be challenging, or they may be withdrawn. Our School always endeavours to support our children through:

13.6.1 The content of the curriculum;

13.6.2 Assessing every child's needs accurately;

13.6.3 Our School ethos, which promotes a positive, supportive and secure environment and gives children a sense of being valued;

13.6.4 Our School behaviour policy, which is aimed at supporting vulnerable children in the school. The school will ensure that the child knows that some behaviour is unacceptable, but they are valued and not blamed for any harm, which has occurred;

13.6.5 Liaison with other agencies or social services that support the child.

13.7 **Prejudice-Based Abuse**

13.7.1 The School recognises that children may experience abuse, bullying, harassment or discrimination based on protected characteristics or perceived differences.

13.7.2 This includes racism, antisemitism, Islamophobia, disability discrimination, sexism, misogyny, homophobia, biphobia, transphobia, faith-based prejudice and other forms of discriminatory behaviour.

13.7.3 Such incidents may be safeguarding concerns and will be taken seriously, recorded, investigated and addressed appropriately.

13.8 Young Carers

13.8.1 The School recognises that young carers may experience additional vulnerabilities and may require Family Help or other support.

13.8.2 Staff should be aware of indicators that a child may be taking on inappropriate caring responsibilities and should report concerns to the DSL

14 REFERENCES

14.1 When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

15 OTHER COMPLAINTS

15.1 Please refer to the School's Complaints Policy for details.

16 WHISTLE-BLOWING

16.1 All staff concerns will be reported on MyConfide and investigated by the DSL/DDSL. Alternatively, concerns may be raised directly with Ofsted by telephone on: 0300 123 3155, via email

at: whistleblowing@ofsted.gov.uk or by writing to: WBHL, Ofsted Piccadilly Gate Store Street Manchester M1 2WD. The Department for Education is also a prescribed body for whistleblowing

16.2 Concerns regarding the way the school safeguards pupils, including poor or unsafe practice, or potential failures, illegal activities, wrongdoing or malpractice should be reported immediately the chair of trustees or a member of the board of trustees.

17 RECORD-KEEPING

17.1 We will hold detailed, accurate and secure written records of concerns and referrals

17.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded via the school's MyConcern/MyConfide system. If you are in any doubt about whether to record something, discuss it with the DSL. Records of low-level concerns about staff behaviour will be maintained securely by the Headteacher and reviewed regularly to identify patterns or emerging safeguarding risks.

17.2.1 Records must include the concern, action taken, decisions reached, rationale for decisions, outcomes and any information shared with external agencies.

17.2.2 Safeguarding records must be sufficiently detailed to demonstrate the school's decision-making and safeguarding actions.

17.2.3 The DSL team will undertake regular audits of safeguarding records held on MyConcern to ensure:

- Concerns are recorded promptly.
- Actions are proportionate and timely.
- Decision-making is evidenced.
- Referrals are appropriately followed up.

Audit findings will inform safeguarding quality improvement, staff training and leadership oversight.

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

17.4 Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school

17.5 Please refer to the School's Data Protection Policy for more details.

18 MONITORING ARRANGEMENTS

18.1 The School will undertake an annual safeguarding review to evaluate the effectiveness of safeguarding arrangements, training, record-keeping, governance, safer recruitment, online safety and safeguarding culture. Findings will be reported to Trustees and used to drive continuous improvement.

Of all the additions, I would prioritise:

- Autism, Communication Differences and Safeguarding.
- Pupil Voice and Communication.
- Safeguarding Culture.

- MyConcern Quality Assurance.
- Governance Oversight.

This policy will be reviewed at least annually and earlier if required by changes to statutory guidance (for example, KCSIE updates or linked DfE guidance). The School will implement changes promptly following publication of updated statutory guidance.

19 Appendix 1: LOCAL BOROUGHS

Brent

Email - cfis@brent.gov.uk

Tel – 0208 937 3010

Ealing

Tel - 0208 825 8000

Greenwich

Tel – 0208 901 2690

Hammersmith & Fulham

Email - Familyservices@lbhf.gov.uk

Tel: 020 8753 6600 (Out of hours: 020 8748 8588)

Harrow

Tel -0208 901 2690

Hillingdon

Email - ibhmash@hillingdon.gov.uk

Tel - 01895 556 633

Kensington and Chelsea

Email - socialservices@rbkc.gov.uk

Tel: 020 7361 3013

Westminster

Email - accesstochildrensservices@westminster.gov.uk

Tel: 020 7641 4000 (Out of hours: 020 7641 6000)

20 APPENDIX 2: CONTACT DETAILS:

Consultation and Advice about a child/young person resident in the City of Westminster

To report a concern about a child or young person in Westminster please contact:

Westminster Access Team – Tel: 020 7641 4000 (Out of hours – 020 7641 6000)

Email: AccesstoChildrensServices@westminster.gov.uk

For case consultations or follow-up enquiries please contact the Duty Child Protection Adviser in the first instance on 020 7641 7668.

Prabha Vashee –

Tel: 07890 380 253

pvashee@westminster.gov.uk

Gabby Bernard –

Tel: 07970 092 412

gbernard@westminster.gov.uk

Vanessa Silva Carriera –

Tel 07971 707 763

vcarriera@westminster.gov.uk

Emily Harcombe –

eharcombe@westminster.gov.uk

For LADO consultations and referrals please contact the duty Child Protection Adviser on:

Telephone: 020 7641 7668

Email: LADO@westminster.gov.uk

If you cannot reach a duty CP Adviser, you can reach:

Duty LADO for consultations and referrals

Telephone: 020 7361 2120

Email: LADO@westminster.gov.uk

Safer Organisations Manager & Local Authority Designated Officer

Aqualma Daniel

Tel: 07870 481 712

Email Aqualma.Daniel@rbkc.gov.uk

Royal Borough of Kensington and Chelsea / City of Westminster

Sally Smith LADO Manager

Tel: 07967 764 794

Email: Sally.Smith@rbkc.gov.uk

Head of Safeguarding, Review and Quality Assurance

Angela Flahive

Telephone: 020 7361 3467

Email: angela.flahive@rbkc.gov.uk

Tri-borough FGM

Rochelle-Ann Naidoo

Tel: 0207 641 1610

Email: rnaidoo@westminster.gov.uk

Prevent Programme Manager, Westminster

Kiran Malik

Telephone: 020 7641 5071

Email: kmalik@westminster.gov.uk

Tri-borough MASH Business Support Officer

Karen Duncan

Telephone: 020 7641 3991

Email: kduncan1@westminster.gov.uk

Tri-borough MASH Business Support Officer

Dhruva Vashee

Telephone: 07866 077169

Email: dvashee@westminster.gov.uk

Bi-Borough Safeguarding Lead for Schools and Education

Elaine Campbell

Telephone: 020 7361 3000 / Mobile: 07712 236 50

Email: elaine.campbell@rbkc.gov.uk

21 APPENDIX 3: FGM SIGNS AND INDICATORS (NSPCC)

21.1 **Signs and indicators**

21.1.1 A girl at immediate risk of FGM may not know what's going to happen. But she might talk about, or you may become aware of:

- a long holiday abroad or going 'home' to visit family;
- relative or cutter visiting from abroad;
- a special occasion or ceremony to 'become a woman' or get ready for marriage; and
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

21.2 **Signs a teacher or school may notice:**

- A family arranging a long break abroad during the summer holidays;
- Unexpected, repeated or prolonged absence from school; and
- Academic work suffering.

21.3 **Indicators FGM may have taken place: the girl may:**

- Have difficulty walking, standing or sitting;
- Spend longer in the bathroom or toilet;
- Appear withdrawn, anxious or depressed;
- Have unusual behaviour after an absence from school; and

be particularly reluctant to undergo normal medical examinations.

22 APPENDIX 4: ALLEGATIONS OF ABUSE MADE AGAINST STAFF

22.1 Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

22.1.1 Behaved in a way that has harmed a child, or may have harmed a child, and/or

22.1.2 Possibly committed a criminal offence against or related to a child, and/or

22.1.3 Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or

22.1.4 Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

22.2 We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

22.3 A 'case manager' will lead any investigation. This will be the headteacher, or the chair of trustees where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

22.4 Our procedures for dealing with allegations will be applied with common sense and judgement.

22.5 SUSPENSION OF THE ACCUSED UNTIL THE CASE IS RESOLVED

22.5.1 Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Based on an assessment of risk, we will consider alternatives such as:

22.5.1.1 Redeployment within the school so that the individual does not have direct contact with the child or children concerned

22.5.1.2 Providing an assistant to be present when the individual has contact with children

22.5.1.3 Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

22.5.1.4 Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

22.5.1.5 Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the school.

22.5.2 If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

22.6 DEFINITIONS FOR OUTCOMES OF ALLEGATION INVESTIGATIONS

22.6.1 **Substantiated:** there is sufficient evidence to prove the allegation

22.6.2 **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

22.6.3 **False:** there is sufficient evidence to disprove the allegation

22.6.4 **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

22.6.5 **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

22.7 PROCEDURE FOR DEALING WITH ALLEGATIONS

22.7.1 In the event of an allegation that meets the criteria above, the case manager will take the following steps:

22.7.1.1 Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

22.7.1.2 Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

22.7.1.3 Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

22.7.1.4 Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

22.7.1.5 Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

22.7.1.6 If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

22.7.1.7 If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

22.7.1.8 If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

22.7.1.9 Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Individuals might also wish to contact their trade union representative or speak with a colleague or contact Education Support's free helpline on 0800 52561.

22.7.1.10 Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

22.7.1.11 Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

22.7.1.12 Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

22.7.2 If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

22.7.3 Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

22.8 ADDITIONAL CONSIDERATIONS FOR SUPPLY TEACHERS AND ALL CONTRACTED STAFF

22.8.1 If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

22.8.1.1 We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

22.8.1.2 The trustees will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

22.8.1.3 We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

22.8.1.4 We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

22.8.1.5 When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

22.9 TIMESCALES

22.9.1 We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

22.9.1.1 Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

22.9.1.2 If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

22.9.1.3 If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

22.9.1.4 However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

22.10 SPECIFIC ACTIONS

22.10.1 Action following a criminal investigation or prosecution

22.10.1.1 The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

22.10.2 Conclusion of a case where the allegation is substantiated

22.10.2.1 If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

22.10.2.2 If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

22.10.3 Individuals returning to work after suspension

22.10.3.1If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

22.10.3.2 The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

22.10.4 Unsubstantiated, unfounded, false or malicious reports or allegations

22.10.4.1 If a report is:

22.10.4.1.1 Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

22.10.4.1.2 Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it **Unsubstantiated, unfounded, false or malicious allegations**

22.10.4.2 If an allegation is:

22.10.4.2.1 Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

22.10.4.2.2 Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

22.11 CONFIDENTIALITY AND INFORMATION SHARING

22.11.1 The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

22.11.2 The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

22.11.2.1 Who needs to know about the allegation and what information can be shared

22.11.2.2 How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

22.11.2.3 What, if any, information can be reasonably given to the wider community to reduce speculation

22.11.2.4 How to manage press interest if, and when, it arises.

22.12 RECORD-KEEPING

22.12.1. The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

22.12.2 The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

22.12.3 For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

22.12.3.1 A clear and comprehensive summary of the allegation

22.12.3.2 Details of how the allegation was followed up and resolved

22.12.3.3 Notes of any action taken, decisions reached and the outcome

22.12.3.4 A declaration on whether the information will be referred to in any future reference

22.12.4 In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

22.12.5 Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

22.12.6 We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

22.13 REFERENCES

22.13.1 When providing employer references, we will:

22.13.1.1 Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

22.13.1.2 Include substantiated allegations, provided that the information is factual and does not include opinions

22.14 LEARNING LESSONS

22.14.1 After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

22.14.1.1 Issues arising from the decision to suspend the member of staff

22.14.1.2 The duration of the suspension

22.14.1.3 Whether or not the suspension was justified

22.14.1.4 The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

22.14.2 For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

22.15 NON-RECENT ALLEGATIONS

22.15.1 Abuse can be reported, no matter how long ago it happened.

22.15.2 We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

22.15.3 Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

22.16 SECTION 2: CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

22.16.1 This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

22.16.2 Concerns may arise through, for example:

22.16.2.1 Suspicion

22.16.2.2 Complaint

22.16.2.3 Disclosure made by a child, parent or other adult within or outside the school

22.16.2.4 Pre-employment vetting checks

22.16.3 We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

22.17 DEFINITION OF LOW-LEVEL CONCERNS

22.17.1 The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

22.17.1.1 Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

22.17.1.2 Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

22.17.2.1 Being overly friendly with children

22.17.2.2 Having favourites

22.17.2.3 Taking photographs of children on their mobile phone

22.17.2.4 Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

22.17.2.5 Using inappropriate sexualised, intimidating or offensive language

22.18 SHARING LOW-LEVEL CONCERNS

22.18.1 We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

22.18.2 We will create this culture by:

22.18.2.1 Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

22.18.2.2 Empowering staff to share any low-level concerns as per section 7.7 of this policy

22.18.2.3 Empowering staff to self-refer

22.18.2.4 Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

22.18.2.5 Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

22.18.2.6 Helping to identify any weakness in the school's safeguarding system

22.19 RESPONDING TO LOW-LEVEL CONCERNS

22.19.1 If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

22.19.1.1 Directly to the person who raised the concern, unless it has been raised anonymously

22.19.1.2 To the individual involved and any witnesses

22.19.1.3 The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct.

22.20 RECORD KEEPING FOR LOW-LEVEL CONCERNS

22.20.1 All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

22.20.2 Records will be:

22.20.2.1 Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

22.20.2.2 Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

22.20.2.3 Retained at least until the individual leaves' employment at the school

22.20.2.4 Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

22.21 REFERENCES

22.21.1 We will not include low-level concerns in references unless:

22.21.1.1 The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

22.21.1.2 The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

22.22 Future Legislative Updates

22.22.1 This policy will be reviewed annually, and sooner if required by changes in statutory guidance or legislation. The school commits to updating this policy promptly to reflect any new requirements, including forthcoming legislation such as the Children's Wellbeing and Schools Act 2026, or future revisions to *Keeping Children Safe in Education*.

22.22.2 Trustees will ensure that all updates are communicated clearly to staff, parents, and pupils, and that training is provided where necessary to maintain compliance.

Revision

Version Update	September 2026
Review due	August 2027
Reviewed By	Tara Morgan
Approved by Board of Trustees on	September 2026