



**Federation of  
Westminster Special Schools  
& Bi-Borough Inclusion Service**

# **Child Protection and Safeguarding Policy**

**Reviewed and approved by Full Governing Board: September 2025**

**Next review: September 2026**

# Key Designated Child Protection and Safeguarding Contacts

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### **Federation Governing Board**

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## 1. Introduction

All schools are required to have a Child Protection Policy that guides the procedures and practices of staff when safeguarding children and young people and promoting their welfare. The Federation of Westminster Special Schools (FWSS) takes its duty towards all the children and young people who have been entrusted to its care very seriously and seeks to provide a school environment where all children and young people are safe, secure, valued, respected, and listened to.

FWSS understands that our work in safeguarding and protecting children and young people must always have regard for the national guidance issued by the Secretary of State and should be in line with local guidance and procedures.

We understand the term safeguarding to mean that we will take all reasonable measures to ensure that the risk of harm to children and young people's welfare is minimised. Protecting children and young people from maltreatment, inside or outside the home, including on line. Providing help and support to meet the needs of children and young people as soon as problems emerge. We also understand that where we have any concerns about a child's welfare we will take all appropriate action to address those concerns by working in full partnership with other agencies.

All permanent and agency staff working within FWSS receive annual training on Child Protection and Safeguarding. All staff have been provided with the statutory guidance set out in the current version of "Keeping Children Safe in Education September 2025".

All staff working within FWSS believe that a range of other school policies are central to many aspects of the Federation's Child Protection Policy, and this document should therefore be read in conjunction with our policies for:

- Anti-Bullying
- Attendance - Poor attendance must now be treated as a safeguarding concern.
- School Behaviour and Rewards
- E-Safety
- Health & Safety
- Safer Recruitment
- Whistleblowing
- Designated Teacher for looked after and previously looked after children

Our Child Protection and Safeguarding policy is written with due regard to the national guidance "Safeguarding Children and Safer Recruitment in Education". Decisions not to appoint due to convictions must be documented to defend recruitment decisions.

Our school procedures for safeguarding children will always be compliant with the London Child Protection Procedures produced by the London Safeguarding Children Board. Those procedures which have been adopted by the Westminster Local Safeguarding Children Board are available from <https://www.londonsafeguardingchildrenprocedures.co.uk/>

Our procedures will be followed by all adults, including volunteers, working with or on behalf of one of the schools.

Our Policy, adopted in July 2013, is reviewed at least annually by the Federation Governing Board, the Designated Safeguarding Lead (DSL). It was reviewed and updated in September 2013 and again in September 2014, July 2015, September 2016, October 2017, October 2018, October 2019, October 2020, November 2021, October 2022, November 2023 and December 2024, September 2025

This policy is available to all parents either in hard copy on request to either school reception, or from our website: [www.qe2cp.westminster.sch.uk](http://www.qe2cp.westminster.sch.uk).

## **2. Federation of Westminster Special Schools Child Protection Statement**

***The Federation of Westminster Special Schools, Bi-Borough Inclusion Service is committed to safeguarding and promoting the welfare of the children and young people we work with. The Governors expect all staff and volunteers to share this commitment by demonstrating their understanding of how each individual adult working on behalf of the Federation has an active part to play in protecting children and young people from harm and promoting their welfare.***

Safeguarding and child protection is **everyone's** responsibly.

All staff must be clear about their own role and that of others in providing a caring and safe environment for all children and young people and must know how they should respond to any concerns about an individual child or young person that may arise.

To this end the Federation will ensure that all staff, whether permanent or temporary, and volunteers know who has designated overall responsibility for child protection and safeguarding.

The Designated Safeguarding Lead (DSL) for each school is the Headteacher of that school.

The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep children and young people safe online. This includes addressing misinformation, disinformation, conspiracy theories, and risks associated with generative AI.

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

Out of school hours our DSL can be contacted by email or telephone – with contact details provided to local partners.

When the DSL is absent the deputy DSLs (DDSL) for either school will act as cover. Both schools have a team of DDSL's who can cover for the DSL as required.

The DSLs will be supported in their role by Pam Jones, Associate Executive Headteacher.

All staff receive training during their induction period, and regularly on an annual basis thereafter at a minimum of every 2 years for any designated staff members in order that they are equipped with the skills needed to keep children safe. Through the academic year there are regular safeguarding professional development opportunities and staff receive weekly

safeguarding soundbites.

The Federation will always follow Safer Recruitment procedures so that we can be confident that all adults working in our school are safe to do so. All new Governors and Associate Members are required to attend the Bi-Borough Safeguarding Course as part of their induction training. In addition, all governors and associate members undertake refresher training on a regular basis. Decisions not to appoint due to convictions must be documented to defend recruitment decisions.

### **3. Child Protection:**

#### ***Responding to concerns***

All children and young people attending the Federation schools must be able to place their trust and confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded appropriately to. All staff must therefore know what to do if a child or young person chooses to talk to them about any matter which raises child protection concerns.

All staff must:

- Listen to what the child or young person is saying without interruption and without asking leading questions.
- Respect the child or young person's right to privacy but not promise confidentiality.
- Reassure the child or young person that they have done the right thing in telling you.
- Explain to the child or young person that in order to keep them safe from harm the information that has been shared with must be passed on.
- Report what has been disclosed to the DSL in the school.
- Record, as soon as is practicable, what was said using the child or young person's actual words.

The DSL for Child Protection will:

- Assess any urgent medical needs of the child or young person
- Consider whether the child or young person has suffered, or is likely to suffer significant harm.
- Check whether the child or young person is currently subject to a Child Protection Plan or has been previously subject to a Plan.
- Confirm whether any previous concerns have been raised by staff.
- Consider whether the matter should be discussed with the child or young person's parents or carers or whether to do so may put the child or young person at further risk of harm because of delay or the parent's possible actions or reactions.
- Seek advice if unsure that a child protection referral should be made.
- In accordance to Working Together to Safeguard Children December 2023 and KCSIE 2025 the DSL will make referral to 'provide help and support to meet the needs of children as soon as problems emerge'. The DSL will either make a referral to the child or young person's local authority, children's services duty or referral and assessment team or, if a referral is not considered appropriate at that stage, make full written records of the information that they have received detailing the reasons for the judgement that the matter was not referred to the local authority.

## ***Recognition and response***

There are four recognised types of abuse and it is important that all staff and volunteers know what they are and how to recognise them.

### *Physical Abuse*

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young person. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to, a child/young person whom they are looking after. A person might do this because they enjoy or need the attention they get through having a sick child. Physical abuse, as well as being a result of an act of commission can also be caused through omission or the failure to act to protect.

### *Emotional Abuse*

Emotional abuse is the persistent emotional ill treatment of a child or young person such as to cause severe and persistent adverse effects on their emotional development. It may involve making a child or young person feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

### *Sexual Abuse*

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware of, or consent to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex or non-penetrative acts such as fondling. Sexual abuse may also include non-contact activities, such as involving children or young people in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children or young people to behave in sexually inappropriate ways. Boys and girls can be sexually abused by males and/or females, by adults and by other young people. This includes people from all different walks of life.

### *Neglect*

Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child or young person from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or young person's basic emotional needs.

Owing to the nature of the day-to-day relationship that children and young people at FWSS have with staff, all adults working in the school are particularly well placed to notice any physical, emotional or behavioural signs that a child or young person may be suffering significant harm. We understand that harm means the ill-treatment or impairment of a child or young person's health and/or development, including that caused as a result of witnessing the ill-treatment of another person.

All staff must therefore be alert to any possible indicators that a child or young person is suffering harm and report any concerns to the DSL or DDSL.

All adults working in the Federation will receive regular Child Protection training in order that their awareness to the possibility of a child or young person suffering remains high.

#### **4. Safeguarding: providing a safe environment**

All parents and carers of children and young people attending FWSS must feel secure in the knowledge that they are entrusting their children to adults who will strive to keep them safe at school. We will do this by:

- Ensuring leaders and members of the governing board receive Safer Recruitment training and updates.
- Decisions not to appoint due to convictions must be documented to defend recruitment decisions.
- Promoting a caring, safe and positive environment within both schools.
- Ensuring that our staff are appropriately trained in safeguarding and child protection according to their role and responsibilities and keep a record of all training undertaken.
- Encouraging the self-esteem and self-assertiveness of all pupils through the curriculum so that the children and young people themselves become aware of danger and risk and what acceptable behaviour is and what is not.
- Working in partnership with all other services and agencies involved in the safeguarding of children and young people.
- Displaying appropriate posters that detail contact numbers for child protection help-lines.
- Always following Safer Recruitment procedures when appointing staff or volunteers to work in the Federation schools and the Bi-borough Inclusion Service.
- Welcoming visitors in a safe and secure manner.
- Undertaking risk assessments when planning out of school activities or trips.
- Ensuring that any community groups which use our premises for the provision of services to children and young people have child protection knowledge and understanding evidenced by a policy or are prepared to adopt our own policy.

#### **5. Safeguarding & child protection in specific circumstances**

We are aware that a child or young person's unexplained and/or persistent absence from school could mean that they are at risk from harm. Therefore:

- We will always report an unexplained absence of a child or young person with a Child Protection Plan to their social worker within one day.
- We will always seek to clarify the reason for a child or young person's absence from school with their parent or carer as soon as is practicable on the first day.
- We will always report a continued absence about which we have not been notified by the parent or carer to the ACE Team.
- We will always report to the local authority the name of any child or young person who has been newly registered to attend our school but does not arrive on the expected day.
- We will always report to the ACE Team the continued absence of a child or young person known or thought to have been taken overseas if they do not return to school on the expected return date.
- We will always notify social services if we are concerned that a child or young person's family may be planning abusive surgery e.g. FGM or other operations considered to be abusive to the child or young person.
- We will monitor any child or young person whose absence is considered to be persistent, i.e. where their overall absence rate is 10% or higher. This will be reported termly to governors.
- Attendance - Poor attendance must now be treated as a safeguarding issue.

## ***Children missing from Education***

Children and young people missing from education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children and young people missing from education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Statutory duties and responsibilities are required of the schools, the local authority and parents/carers, as determined by the Education Act and the [‘Children Missing Education’ guidance \(August 2024\)](#).

## ***Behaviour***

We will always aim to maintain a safe and calm environment by expecting good behaviour from our children and young people in line with our behaviour policy.

We are aware that any physical response from a member of staff to a child or young person’s challenging behaviour could lead to a child protection concern being raised by the child or young person or parent/carer.

- No member of staff will use force when dealing with a child or young person’s breach of our behaviour policy unless the potential consequences of not physically intervening are sufficiently serious to justify such action.
- We will always record any occasion when physical intervention has been necessary.
- We will always notify parents or carers of any such incident.
- We will always notify social services if we are concerned about a significant change in the behaviour of any child or young person which cannot be accounted for, or if we are worried about the reasons for the change.

## ***Bullying***

We understand that bullying is harmful to children and young people. We have an anti-bullying policy that sets out our aim of ensuring no child or young person becomes a victim of bullying and the work that we carry out in school to foster an environment where bullying behaviour is known to be unacceptable. We will always take seriously any reports of bullying and respond appropriately. We understand that bullying may take different forms and may include racist or homophobic behaviour. Any such reported or observed incident will be dealt with in accordance with our anti-bullying policy.

## ***E-Safety***

We recognise that children and young person’s use of the Internet is an important part of their education but that there are risks of harm associated with its use. We have an e-safety policy that addresses how we minimise those risks in school and teach children and young people how to stay safe when using the internet in their lives out of school.

We also recognise that all members of staff and volunteer staff must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

## ***Health & Safety***

We have a Health & Safety Policy which demonstrates the consideration we give to minimising any risk to the children and young people when on the school premises and when undertaking activities out of school under the supervision of our staff.

All visits off site require a risk assessment to be completed and signed off by a senior member of staff before children and young people and staff are allowed to leave.

### ***Radicalisation and Extremism***

In accordance with the [Prevent Duty Guidance 2023](#), all staff will have due regard to the statutory guidance to prevent people from being drawn into terrorism.

We will notify the appropriate authorities if we are concerned that a child or young person is liaising with others who may be abusing their vulnerability.

We will monitor any children and young people who we consider may be accessing or trying to access inappropriate web sites related to extremist views and behaviours and contact parents/carers and other relevant agencies to ensure children and young people do not become victims in this area.

### ***Forced Marriage***

We recognise that forced marriage is a form of abuse. It can lead to domestic violence as it is a form of oppression which may generate physical violence, emotional, sexual or psychological abuse. Forced marriage is significantly different to an “arranged marriage” where consent is given. Where any party to a marriage has not given consent or is in any way put under pressure (e.g. emotional blackmail, threat of violence, abduction etc.) that is considered to be a forced marriage. We will notify the appropriate authorities if we are concerned that a child or young person may be subject to this aspect of abuse.

### ***Female Genital Mutilation (FGM)***

In accordance with the [FGM statutory duty, July 2020](#), we will report to the Police any cases where FGM appears to have been carried out.

We will refer any concerns staff may have to our school nurse, FGM safeguarding Lead and other relevant agencies. Support and guidance to ensure that child or young person’s awareness is raised over the impact this may have and this is embedded throughout the schools.

### ***Child Sexual Exploitation***

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where children and young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some children and young people who are being sexually exploited do not exhibit any external signs of this abuse. Any concerns about CSE should be reported to the DSL.

### ***‘Upskirting’***

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

## **Gender Questioning Children**

The Federation when supporting a gender questioning child or young person will take a cautious approach and consider the broad range of their individual needs, in partnership with the child or young person's parents/carers (other than in the exceptionally rare circumstances where involving parents/carers would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The Federation will refer or to the non-statutory [Guidance for Schools and Colleges in relation to Gender Questioning Children](#), when deciding how to proceed.

## **Domestic Abuse**

The Home Office definition of Domestic Abuse is as follows:

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.'

Coercive Control has become a crime in 2015 and is included in the Serious Crime Act 2015: Person A commits an offence if:

- a) A repeatedly or continuously engages in behaviour towards another person (B) that is controlling or coercive,
- b) at the time of the behaviour, A and B are personally connected,
- c) the behaviour has a serious effect on B, and
- d) A knows or ought to know that the behaviour will have a serious effect on B.

A's behaviour has a "serious effect" on B if:

- a) it causes B to fear, on at least two occasions, that violence will be used against B, or
- b) it causes B serious alarm or distress which has a substantial adverse effect on B's usual day-to-day activities ([www.legislation.gov.uk](http://www.legislation.gov.uk)).

Children and young people can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The definition of domestic abuse, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Whilst the definition of domestic abuse includes only those of age 16 and above, young people below this age threshold may start forming intimate relationships and experience domestic abuse from their boyfriends and girlfriends. In recognition of this, some specialist domestic abuse services will offer support to young people at the age of 13 and above.

Domestic Abuse Act 2021 was signed into law on the 29<sup>th</sup> of April 2021.

As indicated by the National Education Union, various research papers suggest that there is a great need to speak to children and young people about domestic abuse. This stems from the fact that children and young people feel confused about the issue, and those who either lived with domestic abuse or experienced it, want to make sense of their experiences and feelings.

Children and young people will often seek support from their peers; hence, teaching them about healthy relationship and domestic abuse is an important factor in the path of prevention. The prevention work in schools, according to the National Education Union, should start at or prior to the age of 11, before attitudes begin to harden (Silence is Not Always Golden: Tackling Domestic Violence).

### **How Can Schools Support Domestic Abuse Prevention?**

- Through curriculum: incorporating spiralling curriculum on healthy relationships and domestic abuse into PSHE and RSE classes.
- Through early identification of domestic abuse cases: building confidence to recognise domestic abuse and to safely facilitate the disclosure of domestic abuse across the whole school (includes children and young people living with domestic abuse, and young people, parents and staff experiencing DA).
- Through offering support to children and young people, non-abusive parent and staff (internal and external support).

### ***Allegations by other children or young people***

#### *Principles:*

- Where an allegation is made regarding alleged abuse perpetrated by children and young people, the age and understanding of the alleged perpetrator must be considered throughout decision making.
- The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.
- The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the young person concerned within the parameters of the Children Act 1989, and to manage the allegations against them within the criminal justice framework.
- Children and young people who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.
- When dealing with such allegations, professionals should be mindful that there is significant research evidence, to suggest that children/young people who behave in a sexually inappropriate and/or aggressive way towards other children/young people, are often victims of abuse themselves.

#### *Actions:*

Where an allegation of child abuse is made concerning an alleged perpetrator who is under 18 years old:

- All such referrals should be passed onto Children's social care.
- Where a strategy discussion is convened regarding the alleged victim, a separate strategy

discussion should be held regarding the alleged perpetrator.

- Along with considerations outlined in London Child Protection Procedures, this meeting will need to specifically consider:
  - ✓ the nature of the assessment of the child and young person's own circumstances (including consideration of their age and development), particularly regarding sources of risk to them, including any allegations that they are enacting abuse which they have suffered themselves.
  - ✓ early contact with a child or young person's psychiatrist for the alleged perpetrator, where appropriate.
  - ✓ the needs of the child or young person and their family in terms of support. If the alleged perpetrator has a disability this must be accommodated in the planning.
  - ✓ whether the criteria for convening a child protection conference is met with regard to the alleged perpetrator.
  - ✓ risks to other children or young people in, or visiting the household, either from adults implicated by the child or young person or from the child or young person themselves.
  - ✓ a behaviour management plan for the alleged perpetrator.
  - ✓ timing of arrest and interview in relation to the alleged offences. Multiple interviews of children or young people should be avoided.

There is significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children and young people.

## **6. Working together with parents and carers**

### ***Children and Young Person Information***

We recognise the importance of keeping up-to-date and accurate information about our children and young people. We will regularly ask all parents/carers to provide us with the following information and to notify us of any changes that occur.

- Names and contact details of persons with whom the child and young person normally lives
- Names and contact details of all persons with parental responsibility
- At least two emergency contact details.
- Details of any persons authorised to collect the child or young person from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the child or young person (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of GP
- Any other factors which may impact on the safety and welfare of the child or young person.

### ***Confidentiality***

Information about children and young people given to us by the children and young people themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information on a "need to know" basis in order to support the child or young person if that is necessary and appropriate.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. However, whilst the General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent or limit the sharing of information for the purpose of keeping children and young people safe, we must be confident that this is always in the best interests of

the child or young person and overrides any other duties we have regarding confidentiality and information sharing. In doing so we will adhere to the advice detailed in the Government's ['Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers' \(May 2024\)](#).

We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main pupil record, stored securely and only accessible to key members of staff. These records are held securely using safeguarding software for schools called Child Protection Online Monitoring System (CPOMS). We also have a duty to send copies of these records to any school/setting to which the child or young person transfers and actively ensure we receive records from previous settings.

### ***Referrals to partner agencies***

If we have a reason to be concerned about the welfare of a child or young person we will always seek to discuss this with their parents or carers in the first instance.

On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to Children's Services when to do otherwise may put the child/young person at risk of further harm either because of delay, or because of the actions of the parents or carers.

### ***Sharing our Policy***

This policy is available to all parents and parents of prospective children/young people.

## **7. Adults working with children**

All staff and volunteers working with children and young people in the Federation school will be recruited safely. All staff are required to have an enhanced DBS and Barred List check to confirm that the applicant is not disqualified from working with children and young people. In line with KCSIE September 2025 updates, an online search will be conducted as part of our due diligence checks on shortlisted candidates.

### ***Preparation***

- We will always consider the vacancy that has arisen within the context of safeguarding children and young people and ensure that we include the responsibility to safeguard children within the requirements of the role.
- We always consider carefully the knowledge skills and experience required to safeguard children and young people and include these within a person specification.

### ***Advertising***

- We will always advertise our vacancies in a manner that is likely to attract a wide range of applicants.
- The advertisement will always include a statement about our commitment to safeguarding children and young people and our expectation that all applicants will share that commitment.
- The advertisement will state that the post is subject to an enhanced Disclosure and Barring check (DBS)

### ***Applications***

- We will ensure that our application form enables us to gather information about the candidates' suitability to work with children and young people by asking specific and direct questions.
- We will scrutinise all completed application forms.
- We will not accept CVs

## **References**

- We will not accept open references or testimonials.
- We will ask for the names of at least two referees.
- We will take up references prior to interview and ask specific questions about the candidate's previous employment or experience of working with children/young people.
- We will follow up any vague or ambiguous statements.

## **Interviews**

- We will always conduct a face to face interview (virtual interviews may be acceptable in certain circumstances) even when there is only one candidate.
- Our interview panel will always contain at least one member trained in safer recruitment practice. Decisions not to appoint due to convictions must be documented to defend recruitment decisions.
- Our interview questions will seek to ensure we understand the candidate's values and beliefs that relate to children and young people.
- All candidates will be asked to bring original documents which confirm their identity, qualifications, and right to work.

## **Appointments**

- Our offer of appointment will be conditional on all requested checks having been returned as satisfactory, including enhanced DBS check, and to have met the childcare disqualification requirements.
- We will refer to the Independent Safeguarding Authority any person whose checks reveal that they have sought work when barred from working with children. FWSS will make every effort to ensure that all staff engaged as supply agency staff will have undergone checking by their own agency including enhanced DBS check and references.

## **Induction**

- We will always provide newly appointed staff with appropriate guidance about safe working practice, boundaries and propriety and explain the consequences of not following the guidance.

## **Continuing Professional Development**

- We will ensure that all staff receive regular training in Child Protection and Safeguarding.

## **Supervision**

- We will always supervise staff and act on any concerns that relate to the safeguarding of children and young people.

## **Allegations**

- We will always follow our locally agreed procedures for the management of allegations against staff (ref Allegations against Staff policy July 2025).

## **Dismissal**

- We will always refer to the Independent Safeguarding Authority any member of staff who is dismissed because of misconduct relating to a child or young person.

## **Safe Practice**

We understand that all adults working in or on behalf of our Federation have a duty to safeguard children and young people and promote their welfare. We aim to provide a safe and supportive

environment for our children and young people through the relationship we have with them and their parents or carers and will always seek to ensure that all adults working in our school behave in a manner that fosters this relationship. We will ensure that all staff are clear about the expectations we have of their behaviour towards all children and young people and that any incident that falls below our expected standards will be dealt with appropriately. In line with KCSIE September 2025, the Federation will ensure that there is an appropriate adult with a child or young person if there is an involvement of the police.

### ***Monitoring and reviewing our policy and practice***

The DSLs for Child Protection will continually monitor our child protection and safeguarding practices and bring to the notice of the Executive Headteacher and Governors any weaknesses or deficiencies.

The Governing Board has a duty to monitor and remedy any weaknesses that are identified. The implementation and monitoring of safeguarding practice and procedures is reported termly to the Governing Board. Each school hosts a termly Safeguarding Group meeting to review cases and these are attended on occasions by the designated safeguarding governor. The designated safeguarding governor also attends regular school senior leadership team meetings where there is a safeguarding, attendance and behaviour focus. Poor attendance must now be treated as a safeguarding concern under statutory guidance.

An annual report is submitted to the full Governing Board in the autumn term of each year. This outlines the child protection and safeguarding work that has been undertaken during the year. Names of children and young people will not be shared.

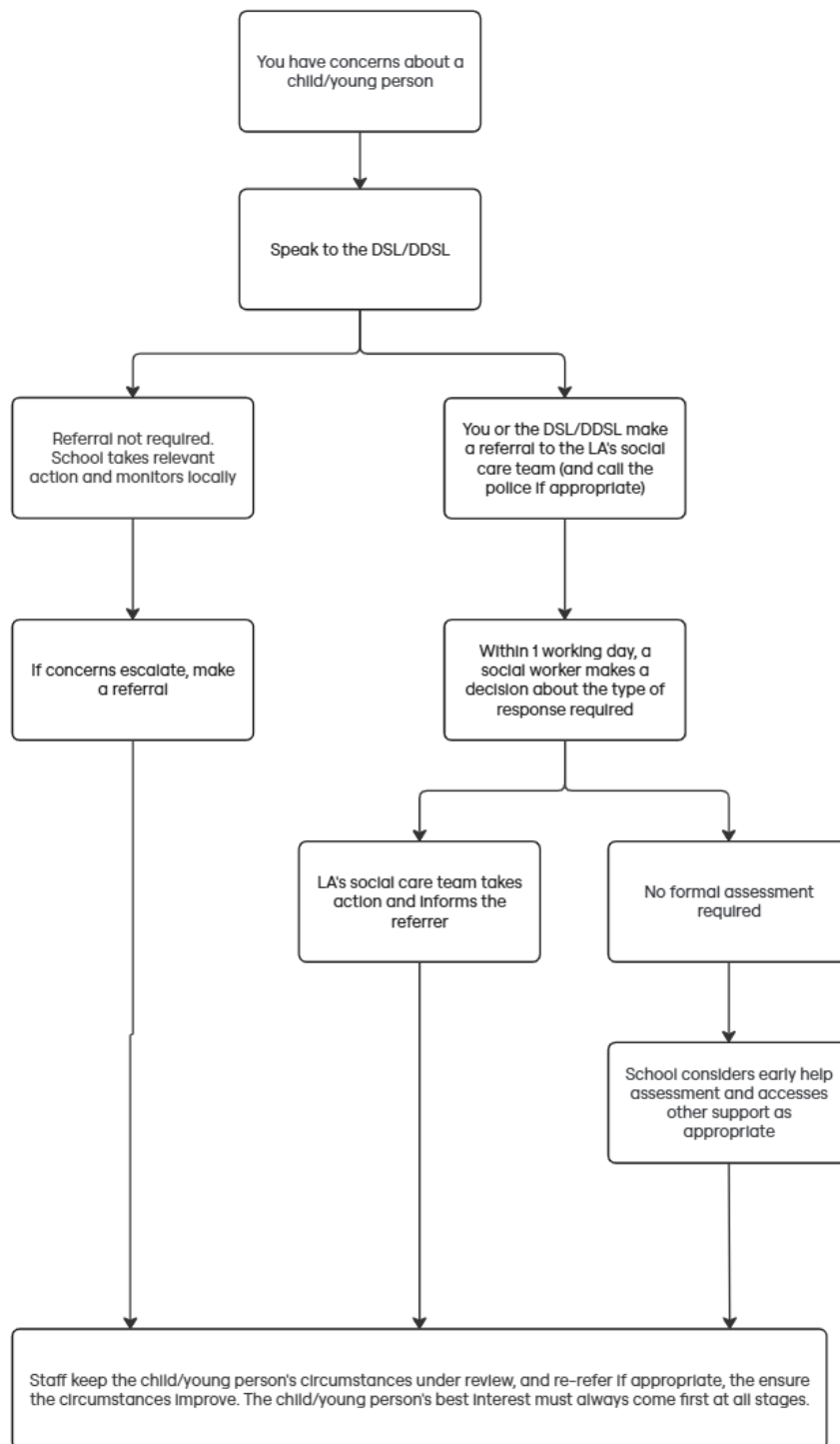
Included in the report will be details of:

- The names of members of staff with designated child protection responsibilities.
- Confirmation that all new staff and volunteers have been recruited safely and that a record of all staff vetting checks is up-to-date and complete.
- The training that has been undertaken by the designated staff.
- The training that has been undertaken by all other staff and volunteers.
- Details of any incidents when physical restraint of pupils has been used.
- Details of information and guidance that has been given to staff.
- Details of safeguarding and child protection issues included in the curriculum.
- Confirmation that all child protection records are stored securely and where appropriate have been transferred to another school.
- Details of safeguarding and child protection information given to parents.
- Details of the safety of the school sites and the access given to visitors.
- Numbers of child protection referrals made to Children's Services.
- Details of child protection conferences or meetings attended regarding children and young people (names are not shared).
- Numbers of children/young people who are, or have been, subject to a Child Protection Plan.

The Governors and Designated Staff will work together on any aspect of Safeguarding and Child Protection that is identified as a priority over the coming year.

**Procedure if you have concerns about a child/young person's welfare (as opposed to believing a child/young person is suffering or likely to suffer from harm, or in immediate danger)**

**Note** – In the unlikely event the DSL or a Deputy DSL is unavailable, this should not delay action. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.



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**Legislation and statutory guidance:**

This policy is based on the Department for Education’s (DfE’s) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#) and the [Maintained Schools Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see below).

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of children and young people
- › The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques. Decisions not to appoint due to convictions must be documented to defend recruitment decisions.
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children and young people
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows the Federation to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The local authority (LA)
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area



**Federation of  
Westminster Special Schools  
& Bi-Borough Inclusion Service**

# **Low Level Concerns Policy**

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### 1. Introduction

At the Federation of Westminster Special Schools, we take safeguarding very seriously. This includes ensuring that adults who work with children and young people do so in a way that is in accordance with the ethos and policies set out by the Federation, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

### 2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children or young people, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the school Headteacher or Head of Bi Borough Inclusion Service about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Executive Headteacher, DSL or a member of the school Senior Leadership Team (SLT) can be contacted.

### 3. Keeping Children Safe in Education September 2025

The following is taken from Keeping Children Safe in Education September 2025

3.1. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

3.2. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

3.3. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- *enable schools and colleges to identify inappropriate, problematic or concerning behaviour early*
- *minimise the risk of abuse, and*

- *ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.*

### ***What is a low-level concern?***

3.4. The term 'low-level' concern does not mean that it is insignificant. 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 the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children and young people
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy – within FWSS this would be a breach of our mobile phone and device acceptable use policy and be treated as such.
- engaging with a child or young person on a one-to-one basis in a secluded area or behind a closed door, outside the usual working practices of the Federation which can include working one-to-one but with vision panels and open access doors reducing seclusion risks
- humiliating children

3.5 Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

3.6 Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child/young person, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

3.7 It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

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

3.9. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

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

#### 4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

##### **Allegation**

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

##### **Low-Level Concern**

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

##### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

## **5. Storing and use of Low-Level Concerns and follow-up information**

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the School Headteacher. This will be stored in accordance with the Federation's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

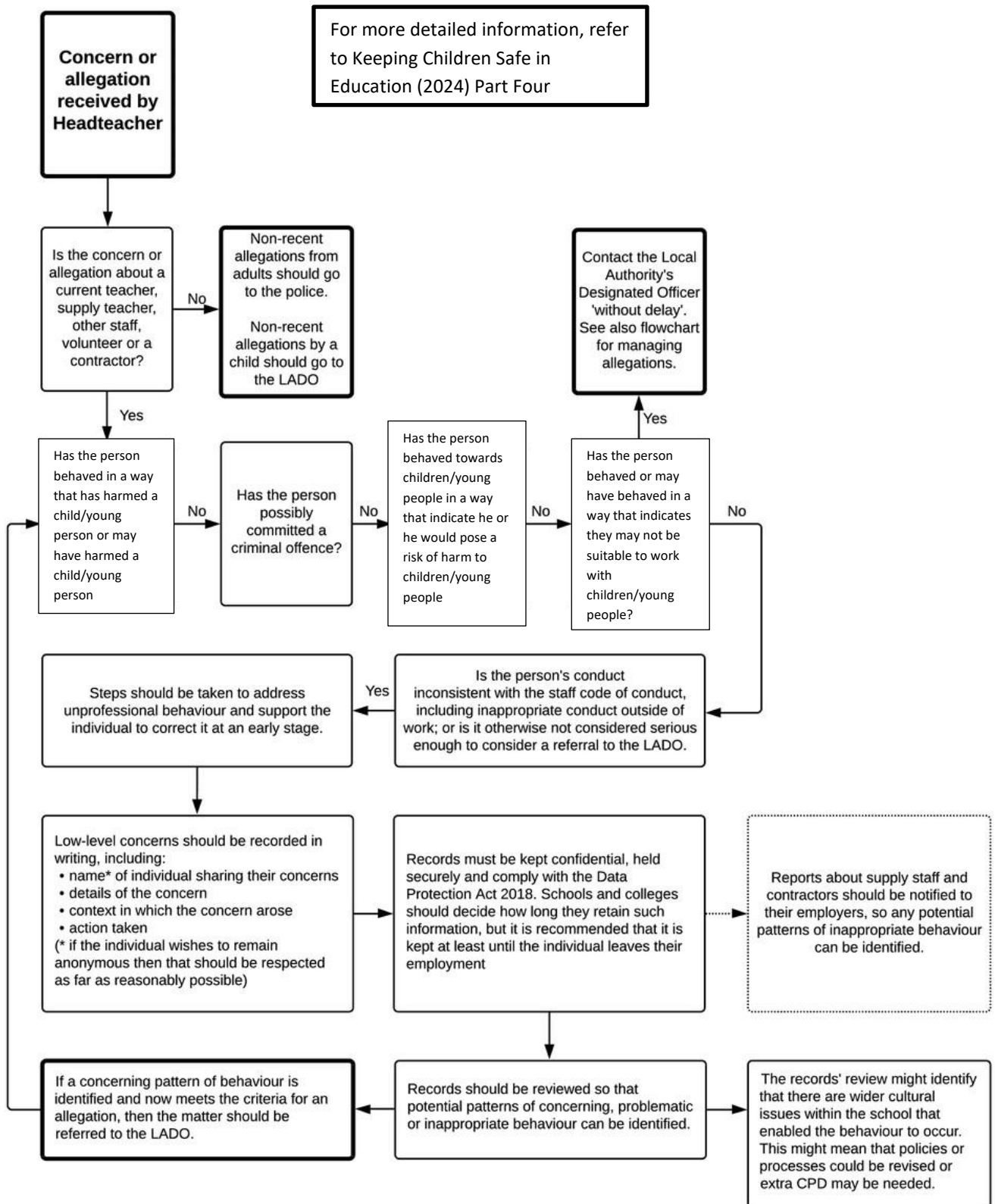
We will not include low-level concerns in references unless:

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

Whenever staff leave the Federation any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

## 6. Process to follow when a Low-Level Concern is raised



### What is a low-level concern?

The term 'low-level concern' does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the threshold set out at KCSIE (2024) paragraph 362. 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 the school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

## **7. Key Reference Document**

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2025

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>