Federation of
Westminster Special Schools
& Bi-Borough Inclusion Service

# Child Protection and Safeguarding Policy

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Next review: September 2027

## Key Designated Child Protection and Safeguarding Contacts

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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 learner and promoting their welfare. The Federation of Westminster Special Schools (FWSS)takes its duty towards all the learner who have been entrusted to its care very seriously and seeks to provide a school environment where all learners are safe, secure, valued, respected, and listened to.

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

In line with Working Together to Safeguard Children 2026 and reflected within KCSIE September 2026 we understand the term safeguarding and promoting the welfare of children and adults to mean

- providing help and support to meet the needs of children and vulnerable adults as soon as problems emerge;
- protecting children and vulnerable adults from maltreatment whether inside or outside the home, including online;
- preventing impairment of children's and vulnerable adults mental and physical health or development;
- ensuring that children and young adults grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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, including temporary staff, agency staff, supply teachers, trainee teachers, volunteers, governors, trustees, contractors and those not directly working with children, are required to read and understand Part One of Keeping Children Safe in Education 2026 in full.

All staff working within FWSS believe that a range of other school policies are central to many aspects of the School'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

This policy has been prepared with regard to Keeping Children Safe in Education 2026, Working Together to Safeguard Children, the current London Child protection Procedures and the arrangements published by local safeguarding partners. London Safeguarding Children Partnership | London SCP

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 School 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, October2019, October 2020, November 2021, October 2022, November 2023, December 2024, September 2025 and September 2026.

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.

## 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 learner 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 school has an active part to play in protecting learner from harm and promoting their welfare.***

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

The Federation recognises that safeguarding arrangements must be inclusive and accessible. Particular attention will be given to learner with SEND, communication differences, English as an additional language, young carers, looked-after and previously looked-after children, children with a social worker, children absent from education, and children or vulnerable adults who may experience discrimination. Reasonable adjustments, accessible communication and the child's preferred means of expression will be used so that concerns can be identified and heard.

All staff must be clear about their own role and that of others in providing a caring and safe environment for all learner 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 College Park is the Assistant Head Pastoral and Queen Elizabeth II Jubilee 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 learner 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 DDSLs who can cover for the DSL as required.

## 3. DSL availability and cover arrangements

Robust cover arrangements will ensure continuity when the DSL is unavailable because of illness, leave or other circumstances. Deputy DSLs will monitor and act on safeguarding concerns without delay and urgent matters will be escalated in accordance with local procedures.

*Safeguarding concerns will be recorded through the Federation safeguarding recording system. Deputy DSL's will monitor alerts throughout the school day, respond without delay and escalate urgent matters to the DSL, Headteacher or local authority children's social care in accordance with local procedures. Each school will maintain an up-to-date cover rota and emergency contact route*

The DSLs will be supported in their role.

All staff must maintain a child-centred approach, identify and report concerns promptly, understand early help, read the required sections of KCSIE 2026 and follow the staff code of conduct. The DSL leads safeguarding, referrals, information sharing, record keeping, training, online safety and filtering and monitoring oversight. Headteachers ensure that this policy is implemented and adequately resourced. The Governing Board provides strategic oversight, assures itself that statutory duties are met, reviews filtering and monitoring arrangements, and challenges weaknesses in safeguarding practice.

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.

## 4. Child Protection

### Responding to concerns

All learner 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.

Owing to the nature of the day-to-day relationship that learners across the Federation 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:

- Listen to what the child or young person is saying without interruption and without asking leading questions.
- Be aware of non-verbal cues and ensuring appropriate means of communication is available
- 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 learner has suffered, or is likely to suffer significant harm.
- Check whether the learner 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 learner's parents or

carers or whether to do so may put the learner 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 2026 and KCSIE September 2026 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 learner's local authority, family help, 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 learner. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to, a learner 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 learner such as to cause severe and persistent adverse effects on their emotional development. It may involve making a learner 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 the child is aware of what is happening. It may involve physical contact, including assault by penetration or non-penetrative acts, and non-contact activities such as involving children in sexual images, watching sexual activities, encouraging sexualised behaviour, grooming, or abuse facilitated by technology. Sexual abuse can be perpetrated by adults or other learners.

*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.

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.

## 5. Safeguarding: providing a safe environment

All parents and carers of learners attending the Federation schools 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.
- 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 learner 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 learners.
- 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 of Westminster schools and the Bi-borough Inclusion Service.
- All visitors, contractors, professionals and parents attending meetings may be required to remove, switch off or securely store wearable technology capable of recording audio, images or video, including smart glasses, recording badges, smart watches and wearable recording devices.
- Undertaking risk assessments when planning out of school activities or trips.
- Where external organisations, clubs, providers or community groups use school premises, the Federation will seek assurance that appropriate safeguarding arrangements are in place, including safer recruitment practices, safeguarding policies, staff suitability checks and procedures for reporting concerns.

**Wearable technology, recording devices and covert recording**
To safeguard pupils, families, staff, governors, visitors and external professionals, the school prohibits the unauthorised use of any device capable of recording audio, video, images or transmitting live recordings whilst on school premises, during school activities, or during meetings conducted on behalf of the school.

This includes, but is not limited to:

- Mobile telephones used for recording

- Smart watches
- Air Pods, earbuds and headphones with recording capability
- Smart glasses and augmented reality glasses
- Body-worn cameras
- Recording badge pins
- Hidden cameras
- AI-enabled wearable devices
- Any other equipment capable of covertly capturing or transmitting audio, images or video

The school does not permit covert recording of:

- Annual Review meetings
- EHCP meetings
- Safeguarding meetings
- Professional meetings
- Parent consultations
- Staff meetings
- Multi-agency meetings
- Training events
- Classroom activities

Any attendee wishing to make a recording for accessibility, disability or communication purposes must seek permission from the Headteacher or meeting chair in advance.

Where there are concerns that covert recording has taken place, the school reserves the right to:

- Request removal of the device
- Pause or terminate the meeting
- Remove individuals from the premises
- Consider safeguarding implications
- Seek legal or data protection advice
- Report concerns to relevant authorities where appropriate

The Federation considers unauthorised recording to be inconsistent with safeguarding, confidentiality, information governance and data protection expectations and may take appropriate action where breaches occur.

## 6. Safeguarding & child protection in specific circumstances

Learners with SEND and complex needs may face additional safeguarding barriers. Indicators of abuse may be wrongly attributed to disability, distress, sensory need, behaviour or communication difference. Some pupils may be dependent on adults for personal care, mobility, medication, feeding or communication. Staff must remain professionally curious, notice changes from individual baselines, use each pupil's established communication system, and record the child or young person's words, signs, symbols, behaviour or presentation accurately. Emotional regulation needs must never be used to dismiss or delay consideration of a safeguarding concern.

Intimate and personal care must follow agreed plans, dignity and privacy safeguards, and reporting procedures.

We are aware that a learner'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 learner with a Child Protection Plan to their social worker within one day.
- We will always seek to clarify the reason for a learner'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 Attendance Team.
- We will always report to the local authority the name of any learner who has been newly registered to attend our school but does not arrive on the expected day.
- We will always report to the Attendance Team the continued absence of a learner 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 learner'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 learner 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.
- The school recognises that children who are absent from education, persistently absent, or missing from education may be at risk of abuse, neglect, child criminal exploitation, child sexual exploitation, radicalisation or other safeguarding concerns. Poor attendance must be treated as a possible safeguarding issue.

**Children missing from education**

The DSL will ensure that the additional vulnerabilities of young carers and children with a social worker are reflected in attendance, welfare and support planning. For looked-after and previously looked-after children, the DSL and Designated Teacher will work with the relevant Virtual School Head and partner agencies, with proportionate information sharing to safeguard welfare and support educational progress.

Learners 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. Learners 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.

**Young carers**

Young carers may face additional safeguarding risks and barriers to education. Caring for a family member with illness, disability or substance-misuse difficulties may affect attendance, attainment, behaviour, wellbeing, relationships and mental health. Staff will be alert to possible caring responsibilities, identify needs early, and share concerns with the DSL.

The DSL will consider universal and community-based early help, targeted Family Help or other referrals as appropriate. The Federation will work with the child, family and partner agencies and make reasonable adjustments to support attendance and engagement.

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 learner 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 and Belonging policy unless the potential consequences of not physically intervening are sufficiently serious to justify such action.

**Use of reasonable force**
Please refer to the Federation Behaviour and Belonging Policy and use of Restrictive Interventions

- The Federation is committed to minimising the need for restrictive intervention through proactive support, positive relationships, reasonable adjustments, prevention and de-escalation. Any use of reasonable force or other restrictive intervention must be lawful, necessary, proportionate, used for the shortest possible time and be the least restrictive response available. Force must never be used as a punishment.
- Staff may use reasonable force only in the limited circumstances permitted by law, including to prevent a pupil from injuring themselves or others, committing a criminal offence, damaging property or causing disorder. Before intervening, staff must consider whether a safer and less restrictive response is available and take account of the pupil's age, communication needs, disability, medical needs, sensory profile, trauma history and other vulnerabilities. Reasonable adjustments must be made for pupils with SEND.
- Any intervention must protect the pupil's dignity, breathing, circulation and physical and emotional welfare. Staff must not deliberately use restraint that affects a pupil's airway, breathing or circulation, including covering the mouth or nose or applying pressure to the neck or abdomen. If a pupil is unintentionally held on the ground, staff must release or reposition them safely as quickly as possible. Medical attention must be obtained where required.
- Seclusion must never be used as a punishment. Where it is used as an immediate safety measure, the pupil must remain supervised, the

environment must be safe, and the pupil must be allowed to leave as soon as the immediate risk of harm has reduced. All incidents of seclusion and non-force restraint will be recorded and reported in accordance with statutory requirements.

- Each significant incident involving the use of force must be recorded in writing as soon as practicable, normally on the same day. The record will include the people involved; the date, time, location and duration; the circumstances and potential triggers; preventive and de-escalation strategies attempted; the nature and degree of force used; why it was considered necessary and proportionate; any injuries or adverse effects; and the medical, emotional and other post-incident support provided.
- Parents or carers will be informed in writing as soon as practicable, normally on the same day, unless doing so would be likely to cause the pupil serious harm, in which case the statutory reporting arrangements will be followed. The reporting requirement applies even where the potential use of intervention is included in an agreed behaviour or positive handling plan.
- Following an incident, the Federation will provide appropriate support and opportunity for separate reflection and debriefing for the pupil and staff involved. Individual behaviour support, risk assessment and positive handling plans will be reviewed after significant incidents and periodically with pupils, parents or carers and relevant professionals.
- Leaders and governors will review anonymised restrictive-intervention data to identify patterns, inequalities, repeated use, injuries, training needs and opportunities to reduce future intervention. Complaints or safeguarding concerns arising from an incident will be considered under the Federation's complaints, safeguarding, staff conduct and allegations procedures, as appropriate. Full operational arrangements are set out in the Federation Behaviour and Restrictive Intervention Policy.

**Bullying**

We understand that bullying is harmful to learners. 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 learners 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.

**Filtering and Monitoring**

The Governing Body and Senior Leadership Team recognise their responsibilities under KCSIE 2026 in relation to online filtering and monitoring. Appropriate systems are in place to:

- Protect pupils from harmful and inappropriate online material.
- Monitor internet use.
- Identify safeguarding concerns.
- Escalate concerns to safeguarding leaders.
- Review filtering and monitoring arrangements at least annually.

Staff understand their role in reporting any concerns relating to online safety systems and vulnerabilities

**Annual review of filtering and monitoring**

The effectiveness of filtering and monitoring systems will be reviewed at least once every academic year by the senior leader responsible for filtering and monitoring, supported by the DSL and IT support. The review, findings, identified weaknesses and resulting actions will be documented and retained.

The review will consider whether systems operate effectively, incidents involving attempted or actual access to harmful content, whether staff and pupils understand reporting routes, and whether systems are proportionate without unnecessarily blocking legitimate educational content.

**Online Safety**

The Federation recognises safeguarding risks associated with generative AI, including fabricated or manipulated content, deepfakes, impersonation, harmful or discriminatory outputs, AI-enabled grooming, and the creation or sharing of nude or semi-nude imagery. Staff must report concerns to the DSL and follow the online safety, data protection and acceptable-use procedures. Pupils will receive accessible teaching about authenticity, consent, privacy and reporting.

Online safety is a safeguarding issue and forms an integral part of safeguarding practice. The school recognises that online risks may include:

- Content risks.
- Contact risks.
- Conduct risks.
- Commercial risks.

These may include:

- Cyberbullying.
- Grooming.
- Sexual exploitation.
- Child criminal exploitation.
- Online fraud.
- Misinformation.
- Disinformation.
- Conspiracy theories.
- Artificial intelligence-generated content.
- Deepfakes and manipulated images.
- Radicalisation and extremism.

Staff will receive regular training regarding emerging technologies, online harms and

generative AI developments.

**Pupil mobile phones**
The Federation is a mobile phone-free environment. Due to the age, needs and vulnerabilities of pupils attending the Federation's special schools, pupils do not ordinarily bring or use personal mobile phones or personal smart devices in school. Parents and carers must contact pupils through the school office.
Any exceptional arrangement required for an individual pupil's medical, accessibility or communication needs must be agreed in advance by the Headteacher. Any device brought into school will be stored securely and returned at the end of the day.

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

**Safeguarding children with medical conditions**
A medical condition is not, by itself, an indicator that a child is at greater safeguarding risk. However, some children may be more dependent on adults for care and may face additional vulnerabilities. Medical or clinical incidents may sometimes raise safeguarding concerns.

Where a clinical incident raises concern, the DSL will work with the responsible healthcare professional to consider whether a safeguarding duty has been triggered, what action is required and whether referral to children's social care or another agency is necessary. Detailed arrangements are set out in the Supporting Pupils with Medical Conditions and allergy-safety procedures.

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

**Early Years Foundation Stage safeguarding requirements**
This section applies to Reception-age children in the Federation's EYFS provision. The EYFS statutory framework places safeguarding and welfare requirements alongside KCSIE. The DSL leads safeguarding and liaison with statutory services and local safeguarding partners.

Child absence: unexplained or prolonged absence will be followed up promptly with parents/carers and alternative emergency contacts. Patterns, the child's vulnerability and family circumstances will be considered, with referral to children's social care or a police welfare check where appropriate.

Safer eating and allergies: dietary requirements, allergies, intolerances and relevant health needs will be obtained before admission and kept current. Staff will follow individual plans, prevent unsafe food sharing, supervise children within sight and hearing while eating, prepare food and textures safely, and record and review

choking incidents. A suitably qualified paediatric first aider will be available in accordance with EYFS requirements, including during eating and outings.

Paediatric first aid: at least one person with a current full-course paediatric first-aid certificate will be on site and available whenever Reception children are present and will accompany outings. Coverage will reflect the number and needs of children and the layout of the premises.

Paediatric first-aid certificated will be made available to parents/carers. Choking incidents requiring intervention will be record where and how the incident occurred, be shared with parents/carers and be reviewed for patterns and preventative action.

Staffing and supervision: statutory qualifications and ratios will be maintained across the provision. Children will usually be within sight and hearing of staff and always within sight or hearing. Arrangements will maintain safe staffing during transitions, breaks, emergencies and outings, with additional adjustments for pupils and medical needs.

Medicines, accidents and injuries: trained staff will administer medicines only with the required authorisation and records. Parents/carers will be told of administration, accidents, injuries and first aid on the same day or as soon as reasonably practicable. Statutory notifications to Ofsted and local safeguarding agencies will be made within the required timescales.

Allegations and Ofsted: in addition to LADO and other safeguarding procedures, the Federation will make any required EYFS notification to Ofsted concerning allegations of harm or abuse involving a person living, working or caring for children at the premises, whether the alleged incident occurred on or away from the premises.

Whistleblowing and complaints: whistleblowing arrangements apply to staff, students and volunteers and state when and how concerns should be reported and what will happen afterwards. EYFS complaints will be recorded, investigated and notified to the complainant within the statutory timescale, and Ofsted contact details will be available to parents/carers.

Information records: the Federation will hold the required identity, parental-responsibility, address, living-arrangement and emergency-contact information for each Reception child and keep it current.

**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 learner 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 learner 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 learner 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 also important to recognise that some learner who are being sexually exploited do not exhibit any external signs of this abuse. Any concerns about CSE should be reported to the DSL.

**Making or sharing of nudes or semi-nudes**
Any incident involving the making, sharing or threatened sharing of nudes or semi-nudes will be treated as a safeguarding concern. This includes consensual and non-consensual imagery, digitally altered or wholly AI-generated imagery such as deepfakes, and financially motivated sexual extortion.

Staff must report concerns immediately to the DSL; must not view, copy, print or forward imagery unless specifically required and advised by statutory guidance or police; and should preserve any device involved without viewing its content. The DSL will assess risk, preserve evidence appropriately, consider referral to children’s social care or police, support affected pupils, consider wider safeguarding concerns, and record decisions and rationale.

**‘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.

**Mental health**
All staff should be aware that mental health concerns can, in some circumstances, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
Staff should not attempt to diagnose mental health conditions but should report concerns to the DSL so that appropriate support and referrals can be considered.

**Serious violence**
Serious violence is a safeguarding concern and may include physical assault; carrying, threatening with or using weapons; and violence connected with peer conflict, bullying, criminal exploitation or offending. All staff must immediately report concern that a child is carrying or using a weapon, or intends to do so, to the DSL or deputy DSL.

The DSL will assess immediate risk, consider police and children’s social care involvement, share information lawfully where others may be at risk, and put appropriate support in place. Staff should recognise increased vulnerability where education has been disrupted through suspension, permanent exclusion or alternative provision, or where there is a history of offending or violent peer association. Early support may include targeted mentoring, therapeutic support, family help and specialist services.

**Mental health safeguarding response**
Mental health difficulties may develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide. Staff should be alert to significant changes in behaviour, sleep, eating, mood, anxiety, withdrawal, physical signs of self-harm, expressions of hopelessness or worthlessness, and talk of suicide or self-harm.

Staff should listen without judgement, reassure the child that speaking was the right action, explain that information may need to be shared to keep them safe, and report concerns to the DSL. If a child is in immediate danger, staff must call 999 or obtain urgent medical help, remain with and supervise the child, and inform the DSL as soon as possible. Any school-led intervention must be safe, effective and appropriate to the child’s needs.

**Gender Questioning Children**
The school 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 School will refer to the non-statutory Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

The school will take a cautious, child-centred approach, consider the individual child's welfare and the welfare of other children, address bullying and wider vulnerabilities, and comply with safeguarding, equality and human-rights duties. The school will not initiate social transition and will respond only where a child or parent/carer requests support. Parents/carers will normally be involved unless the DSL determines that doing so would create a greater safeguarding risk.

Any agreed arrangements concerning names, pronouns, records, toilets, changing, showers or participation in sport will be documented, risk assessed, regularly reviewed and based on the statutory and non-statutory guidance in force at the time. Single-sex facilities and safety requirements will be maintained, with alternative private facilities considered where appropriate.

**Domestic Abuse**

*Operation Encompass*

The Federation participates in local arrangements for receiving police notifications where a child or young person has experienced or been exposed to domestic abuse. Notifications will be received by an appropriately trained safeguarding lead, recorded securely, assessed alongside existing information, and used to determine appropriate support and any necessary referral or information sharing.

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).

Learner 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 29th of April 2021.

As indicated by the National Education Union, various research papers suggest that there is a great need to speak to learners about domestic abuse. This stems from the fact that learners 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.

Learners 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 learners living with domestic abuse, and young people, parents and staff experiencing DA).
- Through offering support to learner, non-abusive parent and staff (internal and external support).

**Misogyny and Violence Against Women and Girls (VAWG)**
The school recognises that misogyny, sexist attitudes and hostility towards women and girls can contribute to harmful behaviours, including sexual harassment, sexual violence, controlling behaviour, coercive control, online abuse, domestic abuse and other forms of gender-based violence.

Staff should be alert to:

- Persistent sexist language or behaviour.
- Derogatory comments about women and girls.
- Sexualised bullying or harassment.
- Online misogynistic content.
- Exposure to extremist or "incel" ideologies.
- Controlling attitudes within relationships.
- Behaviour that normalises violence against women and girls.
- Gender-based discrimination or intimidation.

Such behaviours will be challenged and addressed through the school's safeguarding procedures, behaviour policy, RSHE curriculum, Prevent duty responsibilities and pastoral support systems.

The school is committed to promoting respect, equality, healthy relationships and the safety of all pupils, staff and members of the wider community, and recognises that tackling misogyny forms part of its broader safeguarding responsibilities.

**Allegations by other children or young people**
*Child-on-child sexual harassment, harmful sexual behaviour and sexual violence*
The Federation recognises a continuum from harmful sexual behaviour (HSB) through sexual harassment to sexual violence. HSB is sexual behaviour by a child that is developmentally inappropriate, harmful to themselves or others, or abusive towards another child or adult. It may occur online or offline and can include sexualised language, inappropriate touching, sexual harassment, upskirting, sexualised online bullying, unwanted messages, sexual assault or rape.
All reports will be taken seriously and addressed in a child-protection context. The victim will be reassured and supported; their wishes will be considered; risks to other children will be assessed; and the needs of both the victim and the alleged perpetrator will be considered. Abuse will never be dismissed as banter, “just having a laugh”, “part of growing up” or “boys being boys”. The DSL will consider referral to children’s social care and/or police and ensure support and safety planning for all children involved.

Prevention will include accessible RSHE, online-safety teaching, clear reporting routes, staff training and a whole-school culture of respect, equality, healthy relationships and zero tolerance of sexual harassment, sexual violence and misogyny.

*Principles:*

- Where an allegation is made regarding alleged abuse perpetrated by learner, 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.
- Learner 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 learner.

## 7. Working together with parents and carers

### Learner Information

We recognise the importance of keeping up-to-date and accurate information about our learner. 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 learner 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 learner from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the learner (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 learner.

### Confidentiality

Information about learner given to us by the learner 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 learner. 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 learner 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
https://assets.publishing.service.gov.uk/media/6aa2a5b1c5796a7a179c665a/Information_sharing_duty_statutory_guidance.pdf

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.

Where a learner transfers, the safeguarding file will be transferred securely and separately from the main pupil file as soon as possible, ordinarily within five days for an in-year transfer or within the first five days of the start of a new term. Receipt will be confirmed and a copy retained only where there is a lawful and necessary reason. Decisions and rationale will be recorded.

**Transfer of child protection files**
The DSL will include a summary of current concerns, relevant context and ongoing support needs; use a secure transfer method; obtain confirmation of receipt; retain a copy only where lawful and necessary; and record the decision and rationale. Where information indicates a risk to others, it will be shared promptly so the receiving school can assess risk and establish a support plan. The receiving school's DSL will decide which information should be shared with relevant staff and when.
The Federation will monitor the introduction of any new statutory information-sharing duty and update this policy and associated procedures when the final guidance is published. Until then, staff will follow current statutory guidance and Federation information governance procedures.

**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.

**Alternative provision**
Where a pupil attends alternative provision, the commissioning school retains responsibility for safeguarding. The Federation will obtain written assurance that required safeguarding checks have been completed, confirm that the provider has appropriate safeguarding procedures, maintain regular welfare contact, establish clear information-sharing arrangements and have regard to relevant national standards. The DSL will maintain oversight and ensure concerns are acted on.

**Sharing our Policy**
This policy is available to all parents and parents of prospective children/young people.

## 8. Adults working with children

The Federation will apply KCSIE 2026 safer recruitment across employees, agency and supply staff, trainee teachers, contractors, volunteers and governors. This includes appropriate identity, right to work, qualifications, employment history, reference, DBS, barred list, prohibition, overseas and disqualification checks as applicable, online searches for shortlisted candidates, recording required on the single central record and documenting recruitment decisions and any risk assessment. Concerns about ongoing suitability will be reported and managed without delay.

**Volunteers and regulated activity**
The Federation will apply the statutory definition of regulated activity in force at the time of appointment. Volunteers undertaking teaching, training, instructing,

supervising, advice or guidance relating to wellbeing, or driving a vehicle solely for children, at the statutory frequency or overnight, will be treated as undertaking regulated activity and will require the appropriate enhanced DBS check with children's barred-list information.

For volunteers who are not in regulated activity, a documented risk assessment will determine supervision and whether an enhanced DBS check is appropriate. All volunteer-vetting decisions will be recorded.

For staff and volunteers working in regulated activity with Reception-age children, work must not begin until the required enhanced DBS certificate and barred-list information have been received, in accordance with the EYFS framework in force.

***Preparation***

- We will always consider the vacancy that has arisen within the context of safeguarding learner 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 learner 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 learner 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 learner by asking specific and direct questions.
- We will scrutinise all completed application forms.
- We will not accept CVs

**EYFS prospective staff disclosures**

Prospective staff who will work with Reception-age children must disclose information that may affect suitability to work with children, including relevant arrests, charges, convictions, cautions, court orders, reprimands and warnings. Failure to disclose relevant information may result in withdrawal of an offer or further action.

***References***

- We will not accept open references or testimonials.
- We will ask for the names of at least two referees.

For staff, students and volunteers working in EYFS provision, at least one written reference will be obtained before recruitment is confirmed. The Federation's practice of seeking two referees will be maintained.

- 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.
- Our interview questions will seek to ensure we understand the candidate's values and beliefs that relate to learner.
- 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 Disclosure and Barring Service (DBS) any person whose checks reveal that they have sought work when barred from working with children. The Federation 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 learner.

***Allegations***

Concerns that may meet the harm threshold must be reported immediately to the Headteacher, or to the Executive headteacher or Chair of Governors where the concern is about a Headteacher, and managed in consultation with the LADO. Concerns that do not meet the harm threshold must be recorded and considered under the low-level concerns procedure. Supply agencies and contractors will be

informed about concerns relating to their staff. Records will include the concern, context, action taken, decisions and rationale, and will be reviewed for patterns.

- 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 Disclosure and Barring Service (DBS) 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 School have a duty to safeguard learner and promote their welfare. We aim to provide a safe and supportive environment for our learner 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 learner and that any incident that falls below our expected standards will be dealt with appropriately. In line with KCSIE September 2026, the School will ensure that there is an appropriate adult with a child or young person if there is an involvement of the police.

**Appropriate adult**

An appropriate adult supports, advises and assists the child or young person, facilitates communication with police and helps ensure that any interview is conducted fairly. This may be a parent/carer, social worker or another responsible adult who is neither a police officer nor involved in the investigation. The DSL will coordinate with police where an appropriate adult is required.

**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 Headteachers 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 learner will not be shared.

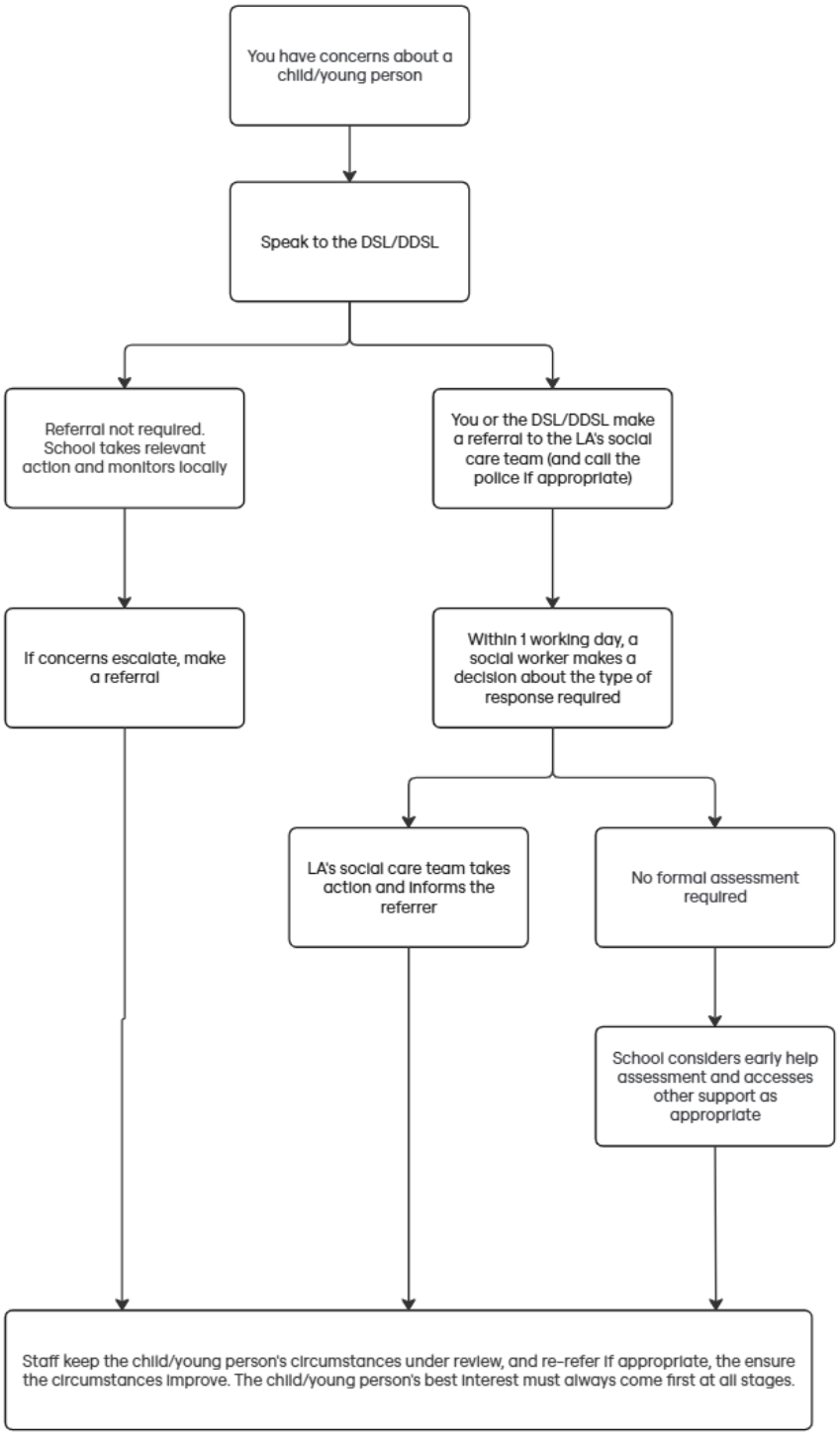
Included in the report will be details of:

- 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 learner (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 learner'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.


You have concerns about a child/young person
Speak to the DSL/DDSL
Referral not required. School takes relevant action and monitors locally
You or the DSL/DDSL make a referral to the LA's social care team (and call the police if appropriate)
If concerns escalate, make a referral
Within 1 working day, a social worker makes a decision about the type of response required
LA's social care team takes action and informs the referrer
No formal assessment required
School considers early help assessment and accesses other support as appropriate
Staff keep the child/young person's circumstances under review, and re-refer if appropriate, the ensure the circumstances improve. The child/young person's best interest must always come first at all stages.
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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 (2026) and Working Together to Safeguard Children (2026) 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:

- Keeping children safe in education: https://assets.publishing.service.gov.uk/media/6aba40e0fceb6fb3a650127d/Keeping_children_safe_in_education_2026.pdf
- Working together to safeguarding children: https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf
- 
- Restrictive interventions including reasonable force in schools https://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf
- Mobile phones in schools: https://www.gov.uk/government/publications/mobile-phones-in-schools/mobile-phones-in-schools

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of learner
- 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
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of learner
- 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 School 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

# Low level concerns

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## 1. Introduction

At the School, we take safeguarding very seriously. This includes ensuring that adults who work with learner do so in a way that is in accordance with the ethos and policies set out by the school, 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 2026

The following is taken from Keeping Children Safe in Education September 2026

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 responsibility and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

•*Enable schools 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 learner

• having favourites

• taking photographs of children on their mobile phone, contrary to school policy – within school 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 school which can include working one-to-one but with vision panels and open access doors reducing 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 promptly with the Headteacher, and at College Park with the DSL and are recorded and dealt with appropriately. Where the concern relates to the Headteacher, it must be reported to the Executive Headteacher or Chair of Governors

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 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 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 and follow-up information will be stored securely within the school's safeguarding systems, with access only by the School Headteacher. This will be stored in accordance with the School'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:

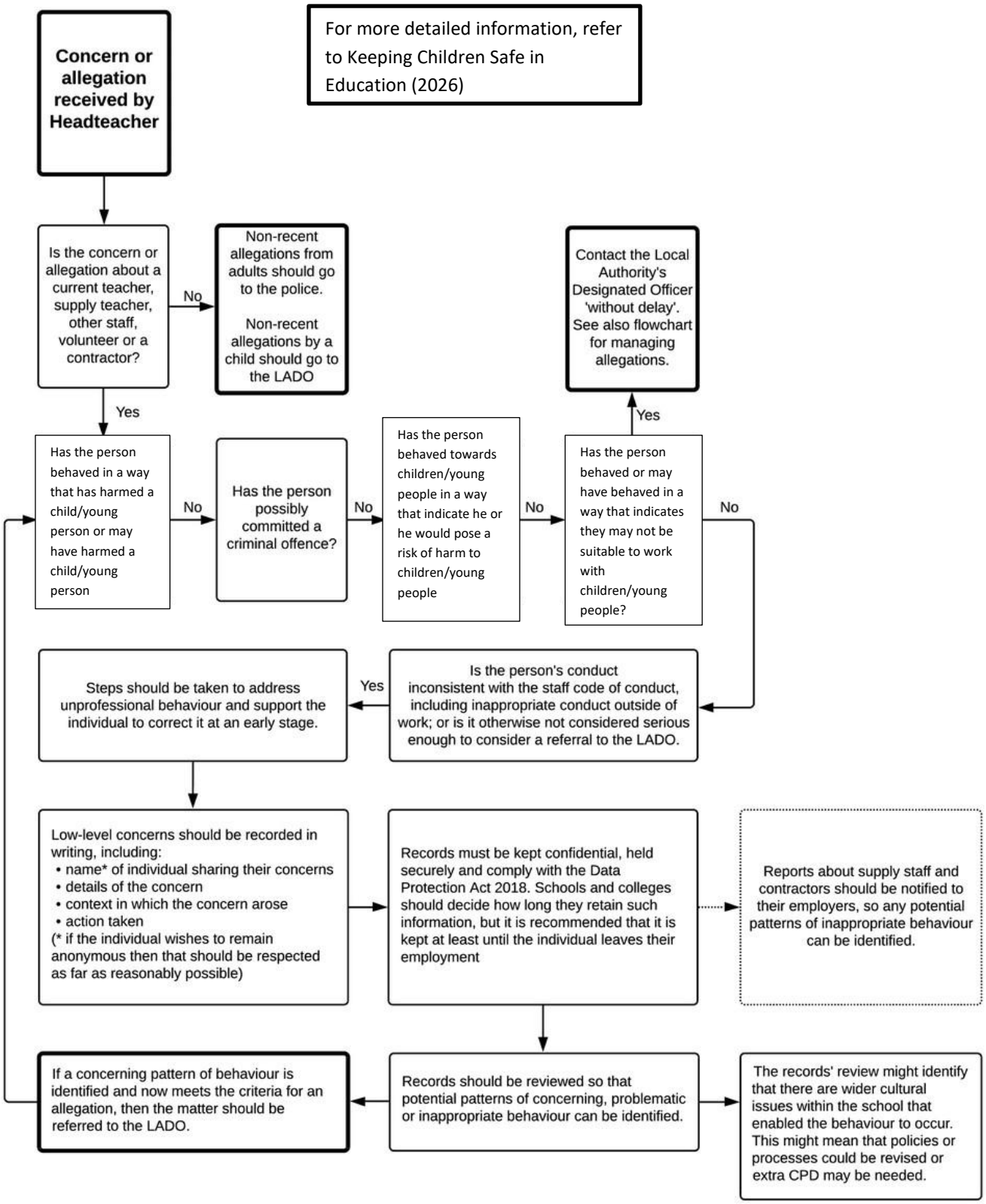
- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Whenever staff leave the school 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 (2026) 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 2026
https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf