Child Protection and Safeguarding policy for Grangewood Independent School

Date approved by Governors & Trustees: September 2026

Review Date of policy: September 2027

Grangewood Independent school is committed to develop and sustain a strong safeguarding culture which supports us all to safeguard children and creates a positive and respectful learning environment in which everyone can flourish.

School Designated Safeguarding Lead: Beverley Roberts

School Deputy Safeguarding Lead: Mabintou Bah

School Designated Safeguarding Governor: Sophia McDonald

Chair of Governors: Jones Agyeman

School Safeguarding Email: safeguarding@grangewoodschool.com

POLICY STATEMENT

This policy applies to Grangewood Independent School ("the School") which includes the EYFS, Before and After-school Clubs, and our specialist resource provision. This policy is reviewed and updated annually (as a minimum) and is available on the School website or on request from the School Office. We inform parents and carers about this policy when their children join the School and with the school newsletter.

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IMPORTANT CONTACT DETAILS:

Safeguarding incidents could happen anywhere, and staff should be alert to possible concerns being raised in this school.

Safeguarding concerns about adults in the school should be made to the Designated Safeguarding Lead or to the Head Teacher.
Safeguarding concerns about independent school Governors and Trustees should go straight to the Local Authority Designated Officer - the LADO.

To contact the following staff members please call the school office in the first instance:
Mrs. B. Roberts - the Designated Safeguarding Lead (DSL).
Mrs. M. Bah - the Designated Deputy Lead Person (DDSL).
Mr. J. Agyeman – The Chair of the Governors (jones.a@grangewoodschool.com).
Mrs. B. Roberts - The Head Teacher and Safer Recruitment Officer.

All staff members may raise concerns directly with Newham Multi-Agency Safeguarding Hub through the Newham MASH Portal.

The school will work with the Local Authority Designated Officer (LADO) as deemed appropriate. The LADO provides advice and guidance to employers and voluntary organisations that have concerns about a person working or volunteering with children and young people who may have behaved inappropriately, or you have received information that may constitute an allegation.

For further advice or help contact:

- **Newham Multi-Agency Safeguarding Hub MASH: 020 3373 4600 (9am – 5.15pm) OR 020 8430 2000 (other times) OR make a request online** Request support or protection of a child.

- **Newham Family Help Offer** - Family Help Offer.

- **The NSPCC 0808 800 5000**
- **The NSPCC whistle-blowing helpline: 0800 028 0285**
- **The dedicated NSPCC helpline number to support anyone who has experienced sexual abuse in educational settings is 0800 136 663.**
-
- **The Police:** 101 to report crime and other concerns that do not require an emergency response**; 999 when there is danger to life or when violence is being used or threatened.**

KEY SCHOOL CONTACTS

Designated Safeguarding Lead (DSL) *Current out of hours contact (only to 6pm) use details opposite.*	**Main DSL for the School** Mrs. B. Roberts TEL: 020 8472 3552 EMAIL: headteacher@grangewoodschool.com

Deputy Designated Safeguarding Lead (DDSL)	**Deputy DSL** Mrs. M. Bah TEL: 020 8472 3552 EMAIL: ynursery@grangewoodschool.com **EYFS DSL** Mrs. M. Bah TEL: 020 8472 3552 EMAIL: ynursery@grangewoodschool.com
Head	Mrs. B. Roberts TEL: 020 8472 3552 EMAIL:headteacher@grangewoodschool.com
Governors	**Chair of Governors** Mr. J. Agyeman TEL: 020 8472 3552 EMAIL: jones.a@grangewoodschool.com **Nominated Safeguarding Governor** Mrs. S. McDonald TEL: 020 8472 3552 EMAIL:

KEY EXTERNAL CONTACTS

Local Authority Designated Officer	NAMES: **Alex Mihu or Evelyn Millyard** TEL: **Alex 07929 182262 or Evelyn 07929 399336** EMAIL: *lado@newham.gov.uk* Alex Mihu: *alex.mihu@newham.gov.uk* Evelyn Millyard: *Evelyn.Millyard2@newham.gov.uk* Emergency Duty Team: 020 8430 2000
Newham Safeguarding and Child Protection Portal:	Newham Families Advice and Support | Safeguarding & Child Protection
Newham Multi-Agency Safeguarding Hub (MASH)	TEL: **020 3373 4600 (9am – 5.15pm)** **OR 020 8430 2000 (other times)** EMAIL: MASH@newham.gov.uk
Education Safeguarding Team	Email: Education.Safeguarding@newham.gov.uk
Single Point of Access / Early Notification	Tel: 020 3373 9983 School Health email: schoolhealth@newham.gov.uk Email: early.notifications@newham.gov.uk

Support and Advice about Extremism	**Police** EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL:SO15Mailbox-PreventNEBCU@met.police.uk PREVENT LEAD: **Ella Cameron** TEL: 0203 373 8369 EMAIL: *Ella.Cameron@newham.gov.uk* **Community Resilience Manager (Prevent)**: **Ghaffar Hussain** Tel: O203 373 2634 *Email: Ghaffar.Hussain@newham.gov.uk* *Community.ResilienceTeam@newham.gov.uk* **Department for Education** NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education. gov.uk
Prevent Referral:	**Prevent Referral:** https://www.gov.uk/guidance/making-a-referral-to-prevent
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Regulation Agency Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: TRA.Caseworker@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: enquiries@ofsted.gov.uk

Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: info@isi.net

Child Exploitation and Online Protection (CEOP)
https://www.ceop.police.uk/safety-centre/

Child Missing in Education (**CME**): **Bouchra Koura-Bennett**
Email: childrenmissingeducation@newham.gov.uk
Referral online e-form: www.newham.gov.uk/schoolcme

FGM support and guidance
Manor Gardens – health and community services
Advice and guidance
Training and workshops
Tel: 0207 272 4231
FGM helpline on 0800 028 3550 or contact the Police on 999

FGM resource pack – resource pack with lots of resources – leaflets to use in different languages. https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack

The Forced Marriage Unit (FMU)
Tel: 020 7008 0151
Email: fmu@fco.gov.uk.

- The NSPCC Helpline: 0808 800 5000
- The NSPCC whistle-blowing helpline: 0800 028 0285

The Police: 101 to report crime and other concerns that do not require an emergency response; 999 when there is danger to life or when violence is being used or threatened.

Childline	Tel: 0800 1111
Redbridge Multi-Agency Safeguarding Hub (MASH)	**020 8708 3885** (Mon – Fri between 9:00am and 5:00 pm **Out of Hours / Emergencies:** 020 8708 5897 or the Children's Emergency Duty Team at 020 8708 5879 **Online Referrals:** Submit a Multi-Agency Referral Form (MARF) via the Redbridge MASH Portal
Enfield Multi-Agency Safeguarding Hub (MASH)	**Urgent Child Protection Concerns:** Call **020 8379 5555** Emergency duty team on 020 8379 1000 **Professional Referrals / Online Portal:** Access the Enfield Children's Portal
Tower Hamlets Multi-Agency Support Team (MAST)	**Phone:** 020 7364 5006 (select option 2 or option 3 for safeguarding/MASH) **Emergency Duty Team (Out of Hours):** 020 7364 4079
Waltham Forest Multi-Agency Safeguarding Hub (MASH)	**Phone:** 020 8496 2310 (Mon - Fri 9:00am to 5:00pm **Out of Hours Emergency Duty Team:** 020 8496 3000

SECTION 1: INTRODUCTION AND FRAMEWORK

INTRODUCTION

This policy applies to the whole of Grangewood Independent School ("the School"), including the Early Years Foundation Stage (EYFS), Before and After-school Clubs and the school's specialist resource provision. Unless stated otherwise, it applies to all staff.

This policy is reviewed and updated at least annually and may be revised at any time in response to changes in legislation, statutory guidance or the School's own safeguarding practices.

This policy is published on the School's website. A copy is available in hard copy on request from the School Office and can be made available in large print or other accessible format if required. This policy is also available to staff via email and on the School's Microsoft Teams platform.

This policy should be read alongside the following School policies and procedures, which together form part of the School's wider safeguarding framework:

- Staff Code of Conduct (including guidance on acceptable use of technology, social media and staff/pupil relationships)
- Whistleblowing Policy
- Behaviour Policy([including anti-bullying, physical intervention and use of restrictive interventions)
- Online Safety Policy (including acceptable use of technology)
- Safer Recruitment Policy
- Low-Level Concerns Policy
- SEND Policy
- Health and Safety Policy
- Attendance Policy
- Relationships and Sex Education Policy
- First-Aid Policy
- EYFS Policy
- Equality
- Educational Visits
- Mobile Phone Policy
- Youth Produced Sexual Imagery (Sexting),
- Preventing Extremism and Radicalisation,
- Photography
- Missing Children
- Whistleblowing
- Complaints
- Pupil Wellbeing and Mental Health Policy
- Risk Assessment Policy}

POLICY STATEMENT AND SAFEGUARDING PRINCIPLES

Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a whole-school approach to safeguarding, which means involving everyone in the School and ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of provision, process and policy development.

The aims of this policy are:

a) to safeguard and promote the welfare of all children at the School and to protect them from harm;
b) to provide clear procedures for identifying, reporting and responding to concerns about a child's welfare, including allegations of abuse, neglect and exploitation, whether current or historic;
c) to ensure that all staff understand their safeguarding responsibilities, are competent to carry them out, and feel supported in doing so;
d) to ensure consistent good safeguarding practice throughout the School; and
e) to promote a whole-school culture of safety, vigilance and openness in which the welfare and best interests of children are at the heart of all decisions, systems, processes and policies.

All staff must be vigilant and maintain an attitude of "it could happen here" where safeguarding is concerned. All staff are required to report any concerns about the safety or welfare of a child, about the conduct of an adult working or volunteering in the School, or about safeguarding practices in the School, in accordance with Section 2 of this policy (there is also a flowchart at Appendix 6). Staff receive training on the types and indicators of abuse, neglect and specific safeguarding risks so that they can identify and report any concerns about children. These are also set out in KCSIE and summarised in Appendix 1.

Staff are expected to exercise professional curiosity and respectfully explore concerns where a child's presentation, behaviour or circumstances suggest they may need help or protection.

Adults should not rely solely on initial explanations where concerns remain.
The school recognises that effective safeguarding requires an understanding of the child's lived experience.

Staff should consider the daily experiences, needs, relationships and wellbeing of the child and ensure that safeguarding decisions are informed by the child's voice, wishes, feelings and circumstances.

Safeguarding interventions should focus on improving outcomes for the child and reducing risk, rather than solely on parental engagement or professional processes. Parents and carers are encouraged to raise any concerns about the safety and/or welfare of children directly with the School, using the contact details and procedures set out in this policy. Parents may also raise concerns directly with the DfE if they wish.

Anyone about whom a concern is raised should feel confident that they will be supported, the matter will be handled sensitively, and appropriate action will be taken.

The School ensures that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse or neglect, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback. The School implements a child-centred approach to safeguarding. Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what support to provide.

Whilst the School is committed to working collaboratively and in partnership with parents and carers as far as possible, the wishes and feelings of the child and what is in their best interests will always be central to the School's decision-making. The School recognises that effective safeguarding is anti-discriminatory and anti-racist. It promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities. The School understands the factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. The School understands its obligations under the Equality Act 2010 and complies with its duty to make reasonable adjustments for disabled pupils.

REGULATORY FRAMEWORK

The Governing Body is responsible for ensuring that the School's safeguarding arrangements are effective and comply with the School's legal and regulatory obligations.

This policy has particular regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) ("*KCSIE*")
- *Working Together to Safeguard Children* (March 2026) ("*WT*")
- *Prevent duty guidance: Guidance for specified authorities in England and Wales* *(December 2023).*
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education* (July 2025).
- *Behaviour in schools* *(February 2024)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities* *(July 2026)*
- *Children Missing Education* *(September 2025)*
- *Digital and technology standards in schools and colleges* *(August 2026)*
- *Mobile phones in schools* *(June 2026)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers)* *(February 2026)*
- *The Charity Commission guidance Safeguarding and protecting people for charities and trustees* (June 2022)]

- *Section 3 of Early Years Foundation Stage Statutory Framework for group and school-based providers (July 2026)*
- *The Education (Independent School Standards) Regulations (December 2014)*

This policy also takes into account the procedures and practice of the London Borough of Newham Safeguarding Children Partnership (NSCP) as part of the multi-agency safeguarding arrangements set up by the London Safeguarding Children Partnership (https://www.londonscp.org.uk/), reflecting the three safeguarding partners: the Local Authority (through Children and Families), Integrated Care Boards (ICB), and the Police.

DEFINITIONS

Safeguarding and promoting the welfare of children is defined as:

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

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online, and in kinship care, foster care or residential care.

Child is legally defined as a person aged under 18. [However, the School's safeguarding arrangements apply consistently to all pupils, including those aged over 18. Where legal duties or procedures differ for pupils aged 18 or over, the School will take account of the relevant legal requirements.]

DSL means the School's Designated Safeguarding Lead. (References to the DSL include the Deputy DSL, where the DSL is unavailable.)

Staff means any individual who works in or on behalf of the School, whether on a paid or unpaid basis, and includes:

- all employees, including teaching staff and support staff;
- supply staff and agency workers, whether engaged directly or through a third-party agency;
- volunteers;
- casual workers;
- contractors;

- peripatetic staff and other specialists who provide services to pupils on the School's premises or at school-organised activities;
- trainee teachers, apprentices, student placements, and other individuals undertaking initial teacher training or work experience at the School; and
- governors, trustees and proprietors.

SECTION 2: REPORTING CONCERNS - WHAT ALL STAFF MUST DO

Concerns About a Child

All staff should understand the indicators of abuse, neglect and specific safeguarding risks, including prejudice-based harm, so that they can identify and report any concerns about children. These are set out in Section 4 and Appendices 1 and 4 as well as in KCSIE.

If staff have any concern about a child, they should report their concern to the DSL immediately. If, in exceptional circumstances, the DSL and Deputy DSL (DDSL) are unavailable, contact the School Designated Safeguarding Governor.

The DSL will consider, with reference to local authority procedures, whether the report can be managed internally, or a family help assessment is needed (see Section 3 of this policy) or it should be referred to statutory agencies such as children's social care and/or the police.

If a child has been harmed or is in immediate danger or at risk of harm, an immediate referral should be made to children's social care and/or the police.

Anyone can make a referral.

A referral will normally be made by the DSL or DDSL but staff should feel confident to make a referral if necessary. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Parental consent is not needed for referrals to statutory agencies. Full contextual information should be shared with children's social care to enable consideration of all the available evidence and the context of any abuse.

Following a referral to children's social care, the local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the type of response required. This may be: immediate protection for the child; statutory enquiries (if the child is considered at risk of significant harm or in need); or no formal assessment, in which case the DSL will consider what further support should be provided.

Staff should always act in the best interests of the child and should not assume that somebody else will take action or share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and/or children's social care as appropriate. If a child's situation does not appear to be improving following a referral, the DSL should press children's social care for reconsideration.

All concerns, discussions, and decisions made (including the reasons for those decisions) should be recorded in writing, regardless of whether an external referral is made. The record should be kept confidential and shared securely with the DSL, using the School's My Concern platform or the reporting templates located in this policy (see Appendix 2 for a template reporting form including body map}. See further information on Record Keeping in Section 3 below.

Where staff have safeguarding concerns about a child who is not a pupil of the School (for example, a sibling of a pupil, or a child attending an activity on the School's premises), they should follow the same procedures and report their concern to the DSL immediately.

See Section 4 of this policy for additional guidance on responding to specific safeguarding issues.

CONCERNS OR ALLEGATIONS ABOUT STAFF

The School provides clear and comprehensive guidance about the standards of appropriate behaviour and actions of its staff in the Staff Code of Conduct which can be found on the School website or in the school office. All staff have a duty to report any safeguarding concern or allegation (no matter how small) about another member of staff, including supply staff, trainee teachers, volunteers and contractors.

The harm threshold

A concern or allegation will meet the 'harm threshold' if it might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

If staff have any safeguarding concerns or allegation about another member of staff:

- This should be referred to the Headteacher, who will consider whether an onward referral to the LADO is required.
- Where there is a concern/allegation about the Headteacher, this should be referred to the Chair of Governors.
- Where there is a conflict of interest in reporting the matter to the Headteacher, this should be reported directly to the LADO.
- On receipt of a report, the Headteacher or Chair of Governors (as appropriate) will follow the procedures set out in Appendix 3 and KCSIE Part 4.
- If staff have a safeguarding concern or an allegation about another member of staff that does not meet the 'harm threshold', then this may be shared with the

DSL first, in accordance with the 'low-level concerns' procedure set out below. (See also the separate Low-Level Concerns Policy.)

- If staff have a safeguarding concern about any other adult who may be present on the school site, for example a visitor or a third party hiring the school premises, they should report their concern to the DSL.

Low-Level Concerns

A low-level concern is any concern that an adult working in or on behalf of the School 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/harm threshold (above) or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, to behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

Staff must share all such concerns with the Headteacher or DDSL without delay. (Concerns reported to the DDSL will be shared with the Headteacher in a timely fashion and the Headteacher is the ultimate decision-maker.) The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy.

Where a low-level concern is about the Headteacher, it should be reported to the Chair of Governors.

Staff are also encouraged to self-refer, in the event that they have found themselves in a situation which may be misinterpreted or appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard.

All concerns will be handled sensitively and will be dealt with appropriately and proportionately in accordance with the procedures set out in Appendix 3.

CONCERNS ABOUT SAFEGUARDING PRACTICES IN THE SCHOOL

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'.

Where staff have concerns about poor or unsafe practices and in any area of the School's provision, including but not limited to safeguarding, these should be raised in accordance with the School's whistleblowing procedures which can be found in the School's Employees Handbook and in the school office.

There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found in External Contacts.

SECTION 3: THE SCHOOL'S SAFEGUARDING ARRANGEMENTS

Management of Safeguarding

The Governing Body is responsible for ensuring that safeguarding arrangements in the school are effective and meet statutory requirements (see 'Oversight of Safeguarding' below). They ensure that a DSL is appointed who is a member of the leadership team and has the appropriate status, authority, skills and experience to carry out the duties of the role.

The Headteacher has day-to-day responsibility for the leadership and management of the School and for the management of concerns and allegations about staff. The Headteacher ensures that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and followed by all staff.

The DSL has lead responsibility for all safeguarding and child protection matters. The DSL's role covers the whole school including the Early Years Foundation Stage and the School's specialist resource provision. Details of the role are set out below. The Deputy DSL is trained to the same standard as the DSL and can be contacted in the absence of the DSL. However, ultimate lead responsibility remains with the DSL and cannot be delegated.

During term time, the DSL and/or the DDSL will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted through the school office.

The School has robust cover arrangements in place for when the DSL is unavailable, including a shared confidential mailbox to ensure safeguarding concerns are received, monitored and acted upon without delay. For out of hours/out of term activities, the School's arrangements to contact the DSL via headteacher@grangewoodschool.com or via the shared confidential mailbox safeguarding@grangewoodschool.com.

Role of the DSL

The DSL takes lead responsibility for safeguarding and child protection across the School, including online safety and understanding the School's filtering and monitoring systems and processes. The DSL provides advice and support to staff, liaises with the Headteacher, safeguarding partners and other agencies, and helps ensure that the School's safeguarding arrangements operate effectively in practice.

The DSL's role includes:

- acting as the School's main point of contact for safeguarding and child protection concerns, and supporting staff to identify, report and respond to concerns in accordance with this policy;

- making referrals to children's social care, the Channel programme, the DBS and/or the police where required;

- liaising with the Headteacher and, where relevant, the case manager and LADO where a safeguarding concern involves a member of staff or another adult working in or on behalf of the School;

- supporting engagement with parents and carers, where appropriate, in order to safeguard and promote children's welfare, including where families may be facing challenging circumstances;

- maintaining clear, accurate, confidential and secure child protection records, and ensuring that safeguarding information is shared, transferred and reviewed in accordance with this policy and KCSIE;

- ensuring that the School's safeguarding policies and procedures are understood by staff, reviewed regularly and updated where needed, including in light of local safeguarding arrangements, emerging risks and lessons learned;

- linking with safeguarding partner arrangements so that staff are aware of local safeguarding procedures, training opportunities and referral routes; and

- promoting the educational outcomes of and a culture in which pupils are listened to, their wishes and feelings are considered, and trusted relationships enable them to raise concerns.

- Participation in preparing termly safeguarding reports for the full Governing Body, as well as completing an annual safeguarding audit and preparation of Section 11 audit to be shared with the Governing Body and the Local Authority.

- Full details of the DSL's role and responsibilities can be found at Annex B of KCSIE.

Oversight of Safeguarding

The governing body has a designated governor with specific responsibilities for safeguarding and related areas to provide strategic oversight, support and challenge to the School's leadership. The designated role includes:

Safeguarding Governor: Mrs S. McDonald is the Nominated Safeguarding Governor. The Safeguarding Governor takes a lead role at board level in championing safeguarding and child protection across the School. Their responsibilities include liaising regularly with the DSL to maintain oversight of safeguarding activity; reviewing and challenging the effectiveness of safeguarding policies and procedures; ensuring that the annual review of this policy is carried out and that safeguarding remains a standing agenda item at governing body meetings; monitoring safeguarding training compliance for staff and governors; and reporting to

the full governing body on safeguarding matters at least termly. The Safeguarding Governor receives enhanced safeguarding training to enable them to provide informed strategic challenge and is familiar with the local multi-agency safeguarding arrangements.

SEND Governors: Mr. J. Agyeman and Ms. A. Green are the designated SEND Governors. The SEND Governors provides strategic oversight of the School's provision for pupils with special educational needs and disabilities, with particular regard to the additional safeguarding challenges that children with SEND can face. The SEND Governors liaises regularly with the SENCO to ensure that safeguarding considerations are fully integrated into the School's SEND provision and that staff are equipped to recognise and respond to safeguarding concerns involving children with SEND.

Online Safety Governor: Mr. T. Roberts is the designated Online Safety Governor. The Online Safety Governor provides board-level oversight of the School's approach to online safety, including filtering and monitoring systems, cyber security arrangements, the safe use of generative AI, and the School's response to online safeguarding incidents. The Online Safety Governor liaises regularly with the DSL and relevant IT staff to ensure that the School's online safety arrangements are robust, proportionate and regularly updated to reflect the rapidly evolving nature of technology and online risks.

Designated Looked After Children Governor: Mr. D. Blankson is the designated Governor for Looked After Children (LAC). The LAC Governor champions the educational progress, attendance, and wellbeing of children in care and previously in care, holding school leaders to account. This involves monitoring the academic attainment, progress, attendance, and exclusion patterns of looked-after and previously looked-after children as a distinct group; and advocating for high aspirations, trauma-informed practices, and whole-school understanding of attachment difficulties or special educational needs (SEN).

Prevent Governor is: Mrs. B. Roberts is the designated Prevent Governor.
The Prevent governor provides strategic oversight to ensure the school complies with the Prevent duty under the Counter-Terrorism and Security Act. This involves checking that the School maintains an up-to-date Prevent risk assessment tailored to its specific context; reviewing how the School meets its legal obligation to prevent people from being drawn into terrorism; verify that all School staff receive appropriate Prevent training and feel confident in identifying early signs of vulnerability or radicalisation..

Pastoral Governor is: Pastor D. Meade is the designated Pastoral Governor.
The Pastoral governor works strategically to support and challenge the School in promoting positive mental health, emotional and spiritual welfare for both pupils and staff. Tis involves work alongside the Headteacher and School leaders to review current wellbeing support and identify areas for improvement; ensure the School includes mental health, wellbeing and spiritual understanding within the curriculum, policies, and daily activities; help the governing board fulfil its legal duty to promote pupil wellbeing and look after staff welfare.

All governors with designated safeguarding-related roles receive appropriate induction and ongoing training relevant to their area of responsibility. They work collaboratively to ensure that the governing body maintains effective strategic oversight of safeguarding across the School, and report to the full governing body on their respective areas at least annually.

Pastoral Support

The School takes proactive steps to support pupils with their physical, mental and emotional wellbeing, including adopting a "whole-school approach", by weaving physical, mental, and emotional health directly into the school's faith-based ethos. Having smaller class sizes, staff notice changes in behaviour or mood much faster than in larger settings; and creating opportunities for 'reflective moments/pauses' during scripture reading to help students process academic or personal stress. The School integrates biblical teaching that validates all emotions (grief, anger, anxiety) as a normal part of the human experience and introduces age-appropriate Christian literature or stories that explore managing feelings to normalize seeking help

The School provides a range of opportunities for pupils to share any concerns and access support for themselves or their peers if needed, including a worry box in the school library, check-in boards, our peer-buddy system, circle times at the end of the day, Lego Therapy, interactive songs (e.g., 'How are you feeling today?', etc.), staff initiated 'curiosity' where unexplained/unexpected changes in mood or behaviour are observed.

Where a concern is raised and the DSL determines that it can be managed internally, and doing so does not place the child at additional risk, the School will put in place appropriate additional pastoral support. This may include, for example, monitoring by the pupil's class teacher or 1:1 support, referral to the School's Nurture Lead, or engagement with parents or carers. The DSL will keep such cases under review and will escalate to external agencies if the pupil's situation does not improve or if further concerns arise.

Early Help and Family Help

Early help means the support available to all children and families through universal and community-based services, including schools, health services, and other local provision. Its purpose is to improve resilience and outcomes, or to reduce the chance of problems getting worse. Any child may benefit from support before statutory intervention, but staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health, and care plan);
- has a mental health need;
- is a young carer (a child who provides, or intends to provide, care for another person);

- is pregnant and/or is a parent themselves;
- has exhibited early signs of abusive, violent and/or harmful behaviours;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of, or has been permanently excluded from schools, or is in Alternative Provision or a Pupil Referral Unit;
- is at risk of exploitation, modern slavery, trafficking, and/or sexual or criminal exploitation;
- is at risk of being radicalised into terrorism;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage; and/or
- is a privately fostered child.

Staff are prepared to identify children who may benefit from Family Help and understand their role and responsibilities within this process. This includes identifying any emerging problems so appropriate support may be provided and in liaison with the Designated Safeguarding Lead (DSL) report any concerns. All staff members are aware of and follow school processes as set out in this policy and are aware of how to use the portal to make a referral to the Newham MASH when there is a need to do so.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff should be able to reassure targeted children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a child ever be made to feel ashamed for making a report.

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children. Our Safeguarding culture

in school depends upon every member of staff being proactive in recognising opportunities to promote and support the development of these protective factors.

This includes the use of appropriate forms of online communication directly from staff to children. We use the functions through the platform for online learning – PurpleMash and AtomLearning. The use of social media (WhatsApp, Twitter, FB etc) for this purpose is inappropriate and would be regarded as a serious breach of professional boundaries.

All staff engage with and support children and the School's Student Council in promoting responsible use of social media, safety around the school and responsibility for their own and others' wellbeing, as an integral element of a strong school safeguarding culture.

The expectation is for school staff to use a range of universal services in conjunction with the DSL to provide as much support as possible to prevent threshold for children's social care from being met. The School understands that prevention and early support are key to preventing escalation and protecting the wellbeing of children.

Where a child's needs go beyond what universal early help services can address, for example, where a child has multiple and/or complex needs or where their circumstances make them more vulnerable, the child may require targeted support through Family Help.

In the first instance, staff who identify a pupil that may benefit from early help or Family Help should discuss this with the School's DSL. If appropriate, the DSL will work with Newham Best Start Family Hubs and the Early Help Hub, to undertake an assessment. Where the child's needs can be met through universal early help, the DSL will coordinate the School's response and liaise with relevant services. Where a child's needs are more complex and may require a multi-disciplinary Family Help assessment, the DSL will make a referral to the Early Help Support Co-ordination Panel (EHSCP) (the EHSCP or Early Help Shared Care (EHSC) Panel in Newham, helps coordinate multi-agency support for families receiving universal services so they get the right targeted support and help, at the right time). Further guidance can be found in Working Together to Safeguard Children and the Families First Partnership Programme Guide.

If early help or Family Help is provided, the matter will be kept under review and consideration given to a referral to children's social care for a child protection assessment if the pupil's situation does not appear to be improving or if concerns escalate.

Risk Assessment

The School takes a comprehensive and inclusive approach to identifying and managing safeguarding and welfare risks to pupils. A formal written risk assessment will not always be necessary, but risk will always be considered and mitigation put in place as appropriate.

Whole-school risk assessments and reviews are carried out where required and in line with the School's Risk Assessment Policy. This includes risk assessments covering the Prevent duty; online safety (including filtering and monitoring); cyber security; the use of artificial intelligence (AI); and extra-familial, contextual and emerging safeguarding risks. The School also uses risk-based processes, as appropriate, to inform safer recruitment decisions; assess the suitability of visiting speakers; manage the use of the School's premises for non-school activities; and respond to allegations or concerns involving staff or pupils.

Where a concern is raised about a pupil's welfare the DSL will consider the risk taking into account the pupil's individual circumstances, wishes and feelings, and the views of relevant professionals where appropriate. If there is a concern that a pupil may also pose a risk to others (for example, because a child is carrying, using or intending to use a weapon, or is involved in serious violence) the School will assess the risk to pupil and any other pupils and members of the school community.

Depending on the circumstances, an individual risk assessment and/or a safety and support plan may be put in place. The same process will apply when the DSL receives information in advance about a pupil who is joining the school.

The School's risk assessment does not replace professional assessments by social workers, the police, health practitioners or specialist services. Where relevant, those assessments will inform the School's safeguarding decisions, support arrangements and any update to the School's own risk assessment.

Risk assessments and any associated mitigation or safety and support plans will be kept under review and updated whenever circumstances change or new information becomes available.

SAFER RECRUITMENT

The School is committed to safer recruitment processes that promote a positive safeguarding culture, whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

All members of staff at the School are subject to the necessary statutory child protection checks before starting work. Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors, Trustees and volunteers to work with children and young people is set out in the School's Safer Recruitment Policy. The Headteacher is responsible for ensuring all members of Staff are recruited in accordance with safer recruitment procedures.

Agencies and third parties that supply staff to work at the School must complete the necessary statutory child protection checks and confirm these to the School before the individual starts work.

The School maintains a Single Central Register of Appointments in accordance with statutory requirements.

The Schools procedures for managing contractors attending the School site can be found in the External Visitors and Contractors Policy.

TRAINING

Induction and training are in line with advice from Newham Safeguarding Children Partnership (NSCP).

Staff

Induction

All staff, should be aware of the systems within the School that support safeguarding, and these will be explained as part of the staff induction process. This includes:

- the child protection and safeguarding policy (including the policy and procedures to deal with child-on-child abuse);
- the role and identity of the DSL and DDSL;
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct, including the School's whistleblowing procedure, low-level concerns policy, the management of allegations against staff, the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media; and
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.

Copies of the above policies and documents, as well as Part one of KCSIE, are provided to all staff during induction. All staff are required to read at least Part one of KCSIE in full and confirm that they have done so. School leaders and staff who work directly with children will also be required to read Annex A of KCSIE and Part five of KCSIE.

The School takes a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors in accordance with KCSIE. This will be assessed on a case-by-case basis by reference to the nature of the individual's role, the opportunity for contact with pupils and the regularity of attendance.

In addition, all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training is regularly updated.

Ongoing training

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment that enables them to learn and achieve their full potential. However, there are identified key adults in schools and in the Local Authority who have specific responsibilities under child protection procedures. The names of those in the School with these specific responsibilities are shown on the front cover sheet of this policy. All staff in the School are familiar with the Newham Family Help Offer.

All staff are also required to:

- Read Part one of KCSIE in full and confirm that they have done so. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes via INSET or a dedicated staff meeting, and Educare online training.
- Understand key information contained in Part one of KCSIE. The School will ensure staff understanding by requiring the completion of the latest KCSIE Part One questionnaire.
- Receive training in safeguarding and child protection regularly, in line with advice from the Newham Safeguarding Children Partnership (NSCP). Training will include:
    - online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring):
    - harmful sexual behaviours (including child on child sexual violence and harassment);
    - recognising and responding to prejudice-based harm as a safeguarding concern, including racism, faith-based prejudice and other forms of discrimination;
    - the safe and effective use of AI including identifying and mitigating the key associated risks to safeguarding, data protection, ethics, and intellectual property; and
    - Prevent awareness training.

- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails and staff meetings.

- **All EYFS staff** are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework (July 2026): “Criteria for effective safeguarding training.” Training must be renewed every two years by TES Educare: Online training for safeguarding children and adults, and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL/DDSL and inset training sessions, as well as termly meetings with their line manager which will always include safeguarding as an agenda item.

DSL and DDSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role as set out in KCSIE Annex B. This includes local inter-agency working protocols, risk assessment training and Prevent awareness training; as well as, training in line with the criteria set out in Annex C of the EYFS Statutory Framework.

The DSL receives additional training on AI-related safeguarding risks, including the creation and sharing of AI-generated intimate imagery (deepfakes), the potential for AI tools to be used to groom or exploit children, and the application of the School's filtering and monitoring arrangements to generative AI tools. Training will be reviewed and updated at least annually to reflect the rapidly evolving nature of AI technology.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. The School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

Safeguarding leaders will engage in appropriate supervision, reflective practice and professional challenge to support effective safeguarding decision-making and staff wellbeing.

The DDSL is trained to the same level as the DSL.

Governors

The Governing Body will ensure that all governors receive appropriate safeguarding and child protection training (including online safety and the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and updated at least annually. The training equips governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective.

The Governing Body ensures that all staff have the knowledge, skills and understanding of children who have an allocated social worker. It recognises their additional vulnerabilities with those of looked after and previously looked after children and monitors school action with all these children to keep them safe. Virtual School Heads now also have responsibility for promoting the educational achievement of children in kinship care (KCSIE 2026).

RECORD KEEPING

All safeguarding concerns, discussions, and decisions (including the reasons for those decisions) should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or

the Prevent programme. This will help if/when responding to any complaint about the way a concern has been handled.

Staff must record all concerns about a pupil's welfare via My Concern or manual system for recording concerns (including arrangements for any staff without internet access).

Safeguarding concerns and referrals will be kept by the DSL in a separate child protection file for each child. Records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information.

They should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, the decision reached and the outcome.

The information will be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it.

The School complies with data protection laws (including the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025) and has regard to the DfE's Data Protection guidance for schools.

Records are kept in line with the School's Data Protection Policy.

Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children's welfare, including their educational outcomes. No single practitioner can have a full picture of a child's needs and circumstances. The School recognises that effective information sharing within the School and with local authority children's social care, the safeguarding partners, and other agencies, organisations and practitioners as required is essential to safeguarding children.

Relevant staff receive appropriate training on the relevant data protection principles so they can be confident about sharing safeguarding information and the legal basis for doing so, including when information can be shared without consent.

Data protection laws support the sharing of relevant information for safeguarding purposes and do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children.

When deciding what information to share, professional judgment will be used to ensure that the information shared is focused and proportionate.

Staff will consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

If in doubt about what information can and should be shared, staff should speak to the DSL.

When sharing safeguarding information, the School will generally seek to be as transparent as possible and inform the pupil and/or their parents or carers, unless doing so could put a child or others at further risk of harm or compromise effective safeguarding arrangements, including police investigations.

The School has appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points.

When a pupil leaves the School, including for in-year transfers, the DSL will ensure their child protection file is transferred to the new school (separately from any other documents) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. The transfer will include a clear, structured summary identifying current safeguarding concerns, relevant context, historic information and any ongoing support needs. The summary will distinguish current safeguarding concerns from historic information and present historic information in appropriate context.

In addition to the child protection file, the DSL will also consider whether any additional information should be shared with the new school in advance particularly where it would support risk assessment or support planning for the child or others and enable the new school to put appropriate support in place.

Where the School receives safeguarding information for pupils, this will be reviewed by the DSL who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns, this may include a conversation between the DSLs at both settings. The DSL will ensure that key staff are aware of any relevant information for new pupils

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff in making decisions about sharing information. Staff should always consult with the DSL if they are unsure about whether information should be shared.

REVIEW OF POLICIES AND PROCEDURES

The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and keeps these under ongoing review.

The Governing Body is responsible for ensuring that this policy is reviewed at least annually, and that the review considers the effectiveness of procedures and their implementation, including lessons learnt. The DSL and Headteacher complete an annual safeguarding audit and Section 11 Report which is shared with the Local Authority and the School Governing Body during the Autumn term. As part of this process the School's Safeguarding and Child Protection Policy is revised, then shared and reviewed by all Governors. The Governing Body will approve the revised policy following each review.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

SECTION 4: RESPONDING TO SPECIFIC SAFEGUARDING ISSUES

Child on Child Abuse (including Sexual Violence And Harassment)

Child on child abuse (including child on child sexual violence and harassment) is abuse by one or more children against another child. It is a safeguarding concern for both the reporting child and the reported child, and is preventable through appropriate education, early identification, intervention and support.

Child on child abuse can happen both inside and outside of school, and can occur online.

Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously and in accordance with this policy.

It can manifest itself in many ways including, but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying);
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents;
- abuse in intimate personal relationships between children (also known as teenage relationship abuse);
- physical abuse e.g. hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- serious physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviours, sexual violence (such as rape, assault by penetration and sexual assault) and sexual harassment, which may include misogyny/misandry (see Appendix 4);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual making or sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes;
- upskirting, initiation/hazing type violence and rituals; and
- a group of children sexually assaulting or sexually harassing a single child or group of children.

The School takes a zero-tolerance approach. Abusive comments and interactions will never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Any such behaviour will be challenged by staff who will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. Children are made aware of how they can report abuse and of the procedures that the School will follow once a report has been made. Children are made aware of how they can report abuse through school displays, lessons presented by class teachers and NSPCC assemblies (e.g., 'Speak Out Stay Safe', SOSS). See also the guidance for staff in Appendix 1 on recognising concerns.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children.

The School will consider extra pastoral support for SEND children (e.g., using visual cards, symbols, Makaton, or emotion boards so children with speech, language, or communication needs can point to or show how they feel rather than relying on spoken English; the School's Applied Behaviour Analysis (ABA) tracking helps the trained staff to recognise non-verbal cues and "behavioural disclosures", ie. unusual shifts in behaviour, withdrawal, or sudden distress that can signal abuse or neglect when a child cannot tell someone directly).

The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes the following steps to minimise the risk of child on child abuse:

- identify vulnerable pupils—such as those with Special Educational Needs and Disabilities (SEND), young carers, or children with additional social challenges, ethnicity, sex, …, and understand specific risk factors they face.
- make it clear across the whole school community that all forms of child on child harm are unacceptable and will be taken seriously.
- foster positive interactions between students and staff, ensuring vulnerable children have a trusted adult they can easily turn to for help.
- deliver age-appropriate Relationships and Health Education through Personal, Social, Health and Economic (PSHE) and PSED lessons and activities, to teach boundaries, consent, and safe physical contact.
- establish simple, confidential ways for children to raise concerns or share worries, tailored to their individual communication abilities.
- act quickly on any early indicators of harmful behaviour to prevent escalation, handling each report on a case-by-case basis.

- put clear processes in place to support the reporting child, address the needs of children displaying harmful behaviours, and work with external agencies (like social care or health teams), when necessary.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures in this policy rather than the School's Anti-Bullying and Behaviour policies.

Any concern about child on child abuse must be reported to the DSL. All children involved (including reporting child(ren), reported child(ren) and any other affected children) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed.

The reporting child(ren) will be supported by validating their experiences (listening immediately), initiating safety planning and multi-agency action, minimising educational disruption.

The School manages such incidences in the same way by considering the need to undertake an immediate risk and needs assessment and as with any other child protection concern, we will follow the same procedures. Pupils initiating such abuse or sexualised behaviour will be subject to an AIM risk assessment / or Brook Traffic Lights (for EY and KS1) which will inform a safety plan for everyone involved, including themselves. This is in line with NSCP and Newham safeguarding policy. There may be further steps in the School's response including referrals to MASH to access Health and other specialist interventions for the reported child.

Appropriate pastoral and safeguarding support will be provided to all children involved, having regard to their individual needs, and support from external agencies will be sought, as appropriate.

Where the concern includes a report of harmful sexual behaviour, sexual violence or sexual harassment. the DSL will follow the procedures set out in Appendix 4.

ONLINE SAFETY

An effective whole-school approach to online safety empowers the School to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate. The School's approach to online safety is supported by the School's E-Safety Policy, which should be read alongside this policy.

Four categories of online risk

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

(a) Content: being exposed to illegal, inappropriate or harmful content, for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. This includes content generated by artificial intelligence tools;

(b) Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate human interaction, for example peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

(c) Conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (including consensual and non-consensual making and sharing of nude or semi-nude images and/or videos, including those generated using AI such as deepfakes), sharing other explicit images, and online bullying; and

(d) Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Staff should be aware that children can also abuse their peers online. This can take the form of abusive, harassing or misogynistic/misandrist messages, the non-consensual sharing of nude or semi-nude images and/or videos (including those generated using AI), and the sharing of abusive images and pornography to those who do not want to receive such content.

Use of Artificial Intelligence (AI)

The School recognises that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks in education. The School is committed to ensuring that the use of AI is safe, ethical, transparent and aligned with the School's safeguarding obligations. The School's approach to AI safeguarding is embedded within the existing provisions of this policy, including in relation to filtering and monitoring, online safety, training and responding to specific safeguarding issues.

The School is alert to the safeguarding risks arising from AI, including but not limited to:

- the generation of deepfake images and AI-generated intimate imagery;
- the potential for AI chatbots to produce harmful, inaccurate, or age-inappropriate content;
- the risk of 'cognitive offloading' where pupils defer their critical thinking to AI tools; and
- the use of AI to facilitate grooming, exploitation, or the creation of child sexual abuse material.

The School ensures that any AI tools used by staff or pupils are subject to the School's filtering and monitoring systems and that access to unapproved AI tools is restricted. The School will only use AI products that meet the DfE's *Generative AI: product safety expectations* and any use of generative AI by staff or pupils will be

carefully considered and assessed, evaluating the benefits and risks within the School's context.

The School's E-Safety Policy[Acceptable Use of AI Policy] sets out further detail on the School's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to that policy alongside the safeguarding procedures set out in this policy.

Staff should be particularly alert to any concerns about:

- a pupil creating, sharing, or being the subject of AI-generated intimate imagery (deepfakes);
- a pupil being exposed to harmful, inaccurate, or age-inappropriate content through an AI tool;
- a pupil's personal data being compromised through the use of an AI tool;
- a pupil interacting with an AI chatbot in a way that causes concern for their welfare or mental health; and
- a member of staff using AI in a way that may compromise pupil safety or data security.

Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT systems. The School's filtering and monitoring systems are Sophos and Lightspeed Alert.

The School ensures compliance with the DfE's 'Cyber security/filtering and monitoring standards for schools' by:

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- reviewing the effectiveness of the filtering and monitoring provision at least annually. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's DSL and IT support. They will include regular checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- having effective monitoring strategies in place that meet our safeguarding needs.

The School ensures that its filtering and monitoring arrangements addresses risks, including in relation to any generative AI tools used within the School. We periodically use the DfE 'Plan technology for your school' tool to audit filtering and monitoring and follow DfE guidance on Generative AI: product safety expectations.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote education and online learning activities directed by the School, this will include homework which requires specific online access or interaction, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Cyber Security

The School recognises that cyber security is a safeguarding concern. If a child's sensitive data is compromised by a cyber-attack, it puts their safety and wellbeing at risk.
The School takes steps to protect personal information and ensure appropriate cyber security systems are in place, in line with the DfE's *Cyber security standards for schools and colleges* and the *Digital and technology standards in schools and colleges*.

The School's arrangements include:

- maintaining an information asset register,
- keeping hardware, software and systems registers up to date,
- ensuring appropriate access controls and back-up arrangements are in place,
- providing cyber security awareness training, [and]
- ensuring that digital technology is addressed in the School's disaster recovery and business continuity planning.

These arrangements are designed to strengthen cyber resilience, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks.

Use of Mobile Phones

The School operates as a mobile phone-free environment by default, in accordance with the DfE's statutory guidance on Mobile phones in schools. Pupils do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

The School's mobile phone policy can be found in the school office.

The School recognises that notwithstanding the mobile phone ban, children may still have access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), through other personal devices such as smart watches or, where permitted, personal laptops or tablets. The School's filtering and monitoring systems may not apply to content accessed via pupils' personal devices where those devices are not connected to the School's network.

To mitigate this risk, the School requires any personal device used in School to connect to the internet only through the School's filtered network; prohibits the use of personal mobile data connections on the School premises; restricts the types of personal devices that pupils may bring into School; and ensuring that any 'bring your own device' (BYOD) arrangements are subject to the School's acceptable use policy

and that devices are configured to comply with the School's filtering requirements before being used on the School premises.

Reporting online safety concerns

Any online safety concern that constitutes a safeguarding concern, including those arising out of the use of personal mobile phones and AI tools, should be reported to the DSL immediately in accordance with the procedures set out in Section 2 of this policy. Staff should not investigate online safety incidents themselves, view any illegal images, or forward any concerning material. Where a device needs to be confiscated as evidence, it should be secured and passed to the DSL.
If staff or pupils are at risk of commerce-based harms (such as phishing or financial scams), this should be reported to the Anti-Phishing Working Group in addition to the DSL.

If there are concerns of cybercrime (see Appendix 1), the DSL should consider referring into the Cyber Choices programme, a nationwide police programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences.

Where the concern involves nude or semi-nude images, see further guidance below.

Nude or-Semi Nude Images and/or Videos (including AI-Generated)

The School is alert to the safeguarding risks arising from the making and sharing of nude and semi-nude mages and/or videos, including those generated using artificial intelligence (AI) tools such as deepfakes. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The making or sharing of nude and semi-nude images and/or videos including those generated using AI can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person. Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

If staff are notified of or become aware of an incident of nude or semi-nude images and/or videos (including AI-generated) being shared by or of a pupil, they should:

- refer the incident to the DSL as soon as possible;
- not view, copy, print, share, store or save the imagery, or ask a child to share or download it (if staff have already viewed an image by accident, this should be reported to the DSL);
- not delete the imagery or ask the child to delete it; and
- confiscate and secure any device(s) involved, if appropriate, and pass them to the DSL.

All staff have a duty to recognise and refer any incidents involving nude and semi-nude intimate images and/or videos including those generated using AI, e.g. deepfakes, and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

All incidents involving the making or sharing of nude or semi-nude images and/or videos (including AI-generated), will receive a safeguarding response regardless of whether they are consensual or non-consensual.

Detailed procedures for incidents involving nude and semi-nude and/or videos (including AI-generated) are set out in Appendix 5.

CHILDREN ABSENT FROM EDUCATION (including attendance issues)

Children who are absent from education (particularly on repeat occasions and/or for prolonged periods) can act as a vital warning sign to a range of safeguarding issues (see Appendix 1 for more details). The School's procedures for managing attendance and absence are set out in the Attendance Policy published on the school website.

The School will always try to make contact with a responsible adult when a child is absent without explanation and, where reasonably possible, will hold two emergency contact numbers for each pupil. For children in the early years setting, the School will, where possible, hold more than two emergency contact numbers for each child.]

Where contact is not successfully made, a referral may be made to another appropriate agency (Newham Attendance Targeted Support Service, Social Care or Police).

Where parents inform us of their intent to EHE, we will work with them, the LA and other key professionals (i.e. the EHE teacher) to coordinate a meeting, ideally, before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan the LA has the capacity to veto an EHE arrangement.

Children who are absent and for who we are unable to contact for a maximum of three days will be visited at home for a welfare check.

The School will inform the local authority and the local authority where the child is normally resident, of any pupil who: fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more or will miss 15 days consecutively or cumulatively because of illness, at such intervals as are agreed between the School and the local authority.

The School will also inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at a non-standard transition point.

School attendance registers are carefully monitored to identify any trends, patterns or reasons for absence that might give rise to concerns. Action will be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the statutory DfE guidance *'Working together to improve school attendance'* and to the EYFS Statutory Framework for children aged 0-5 years.

RADICALISATION and PREVENT

The School has a specific duty to take steps to prevent staff and pupils being radicalised into terrorism or extremist ideology (the 'Prevent duty'). Definitions of radicalisation, extremism and terrorism (and links to further guidance) are set out in Appendix 1.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism.

The School carries out appropriate risk assessments (following consultation with local partners) to assess how pupils or staff may be at risk of being radicalised into terrorism or extremist ideas, including online. These are discussed with the Head, DSL and the governor responsible for safeguarding, to ensure the School's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified and appropriate support provided. Risk assessments are regularly reviewed.

The DSL and the Deputy DSL have undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have been made aware of the Prevent duty through training.

The School ensures that teaching and the curriculum promote fundamental British values, and help challenge extremist views. Appropriate filtering and monitoring is in place on school devices and networks to restrict pupil access to terrorist and extremist material when accessing the internet in school.

The School makes arrangements to ensure the suitability of visiting speakers (see Section 5 of this policy).

As with other safeguarding risks staff should be alert to changes in pupils' behaviour which could indicate that they may need help or protection. If staff have concerns that a pupil may be susceptible to radicalisation or may be at risk of being drawn into terrorism, they must report this to the DSL immediately.

The DSL will consider the concern in accordance with local procedures and may make a Prevent referral, seek advice from the local Prevent lead, children's social

care and/or the police, or make a referral to children's social care. If the DSL (or DDSL) is not available staff should contact the local authority Prevent lead or police directly (contact details given within the 'External Contacts' section at the beginning of this policy) to seek advice or make a Prevent referral, and inform the DSL.

Such cases may also involve a referral to the Channel programme or to children's social care depending on the level of risk. Channel is a voluntary programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

If there is an immediate risk of harm, or staff believe that a terrorist act is being planned or committed, they must call 999 and then inform the DSL as soon as practicable.

FEMALE GENITAL MUTILATION (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is a form of honour-based abuse and is illegal in the UK. Further information on the types and signs of honour-based abused including FGM are set out in Appendix 1.

If staff have a concern that a pupil may be at risk of FGM or other honour-based abuse, they should speak to the DSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.
There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School's usual safeguarding procedures and report to the DSL.

CHILDREN POTENTIALLY AT GREATER RISK OF HARM

Children requiring mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils.

Specifically, staff can support the fulfilment of 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

All staff should be aware that mental health problems can, in some cases develop into a safeguarding concern. This could include, for example, self-harm, eating disorders, or suicidal ideation. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.
Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in Section 2 of this policy. Where support is needed, the DSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Staff should not wait for a formal diagnosis before raising a concern with the DSL. If staff feel that a child is in immediate danger and the DSL or DDSL is not available, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

The School's Mental Health Lead is Mabintou Bah.

Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

Staff are aware of these vulnerabilities and the School promotes inclusion through its RSE/PSHE curriculum, pastoral care, expectations of behaviour and anti-bullying procedures.

The foundational premise of the School's ethos, 'that every child is specially and uniquely made' and therefore worthy of respect, love and acceptance, is embedded in lessons and all aspects of school life.

Children who are questioning their gender

When supporting a gender questioning child, the School will not initiate any action. The School will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law.
The DSL will be involved in all cases where a child is questioning their gender. Staff will not adopt any changes relating to social transition unless a decision has been made by a school or college and a child's parents or carers have been involved.

Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

In line with its statutory obligations and in accordance with KCSIE, the School does not permit children to use toilets, changing rooms or residential accommodation designated for the opposite biological sex, with no exceptions.

The School also has regard to the requirements set out in Part two of KCSIE regarding single-sex sport where this is necessary for reasons of safety. Where a gender-questioning child does not wish to use the facilities designated for their biological sex, and the School will consider whether alternative provision (such as individual self-contained facilities) can be made available without compromising single-sex provision for other children.

Children with special educational needs and/or disabilities (SEND)

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;

- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- the need for intimate care or that these children are isolated from others;
- that these children are more likely to be dependent on adults for care; and
- that these children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children with medical conditions

The School has separate policies on Allergy Safety and Administering Medications.

The fact that there has been an incident relating to the management of a child's medical condition or allergy would not, in itself warrant a referral to local safeguarding partners.

The DSL will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the child at risk.

The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Children with a social worker

Children may need a social worker due to safeguarding or welfare needs linked to abuse, neglect, exploitation and/or complex family circumstances.

A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

If local authorities share the fact a child has a social worker, the DSL will hold and use this information to inform decisions about safeguarding (for example, responding

to unauthorised absence or missing education where there are known safeguarding risks) and to promote welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Young carers

A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry.

Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age and which may be impacting on their attendance, attainment, or wellbeing.

Concerns about young carers should be discussed with the DSL to ensure that appropriate support, referrals and reasonable adjustments are considered.

Where identified, the school will work collaboratively with families and partner agencies to ensure young carers receive timely support and assistance

Looked after and previously looked after children

The School recognises that looked after children (in the care of a local authority), and children who have previously been in the care of a local authority, are among the most vulnerable groups of children and can face additional safeguarding challenges.

The DSL will form a link with the Virtual School Head in the borough to communicate about children who are LAC, CIN / CP, In Kinship Care.

A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The Governing Body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority, and the information they need in relation to a child's looked after legal status.

David Blankson is the School's designated member of staff who has responsibility for promoting the educational achievement and welfare of looked after and previously looked after children. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

The DSL maintains details of the child's social worker and any relevant information held about the child's looked after status, care arrangements and contact arrangements. This information will be used to inform decisions made in the best interests of the child's safety, welfare and educational outcomes.

Children Educated in an Alternative Provision

The School recognises that pupils educated in Alternative Provision (AP) may be at increased risk of harm, exploitation, poor educational outcomes and disengagement from education.

Where the School commissions or arranges an Alternative Provision placement, the School retains overall responsibility for the safeguarding and welfare of the child.

The School will:

- undertake appropriate due diligence before any placement is agreed;
- obtain written confirmation that all required safeguarding and vetting checks have been carried out on staff working within the provision;
- maintain accurate records of where pupils are educated during the school day, including any satellite or subcontracted provision;
- ensure safeguarding information is shared appropriately between settings;
- review placements regularly, and at least half-termly, to ensure they continue to meet the child's needs and remain safe and suitable;
- maintain oversight of attendance, welfare, safeguarding and educational progress;
- respond promptly to any safeguarding concerns arising within the placement.

The school recognises that children in Alternative Provision often have complex and additional vulnerabilities and will ensure safeguarding support is proportionate to their needs.

SECTION 5: OTHER SAFEGUARDING RESPONSIBILITIES

TEACHING CHILDREN HOW TO KEEP SAFE

The Governing Body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism.

The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, those who have suffered abuse and some children with SEND might be needed.

Teaching online safety

The School teaches children about online safety as an integral part of the curriculum, including through PSHE and Relationships Education (RSE). Children are taught to adjust their behaviours to reduce risks online, to build resilience, and to know where to turn for help.

This includes teaching about:

- the safe use of electronic equipment, the internet and social media;
- the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise other people;
- the making and sharing of nude and semi-nude images and/or videos (including AI-generated imagery) and the legal consequences;
- online harms such as pornography, misogynistic influencers, deepfakes and disinformation; and
- how and where to seek help if they encounter something online that concerns or upsets them.

The School liaises with parents and carers to reinforce the importance of children being safe online and to make them aware of the systems the School uses to filter and monitor online use.

The School provides guidance to parents on online safety, including information about the risks children may face online and how parents can support their children at home.

RSE - Relationships and Sex Education

The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The School's Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment derogatory behaviour or other forms of physical violence and conflict.

The School focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health.

The School's curriculum also addresses online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help, in an age-appropriate way.

The School recognises that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education.

The School's Relationships Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the School will use.

The School proactively engages and consults parents in the development and review of this policy. Parents are informed of their right to request that their child is withdrawn from sex education.

PHOTOGRAPHS AND IMAGES OF CHILDREN

The School recognises that images of pupils published by the School on its website, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The School's approach to obtaining consent for, publishing, and managing pupil images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the School's Acceptable Use of Images Policy.

Staff should refer to that policy for guidance on the publication of pupil images and should report any concerns about the misuse or manipulation of published images to the DSL immediately.

ARRANGEMENTS FOR VISITING SPEAKERS

The School will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.

In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided to ensure that it is aligned to the ethos and values of the School.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.

The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

USE OF PREMISES FOR NON-SCHOOL ACTIVITIES

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

If the School receives an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities), the School will follow this safeguarding policy and procedures, including informing the LADO.

The School will ensure that the DSL or DDSL can be contacted (or appropriate cover arrangements are in place) at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children

attending are on the school roll. Vetting procedures, and clear lines of communication are enforced.

The DSL or DDSL will be contactable through the school Business Manager (Terry Roberts), who oversees all arrangements for the use of premises for non-school activities and provides a direct mobile phone number to the individual or organisation using the school premises, if a child protection concern or allegation arises during the session.

External providers, staff, and volunteers running activities must undergo appropriate Disclosure and Barring Service (DBS) checks depending on the nature of the activity.

The school's Governing Body will seek written assurance that third-party providers have robust child protection, health and safety, and first-aid policies in place.

Comprehensive risk assessments must be completed beforehand, covering emergency and fire exit routes, first-aid coverage, and restricting access to unauthorized areas of the school site.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement), including clear protocols for how external providers will liaise with the school's DSL, as a condition of use and occupation of the premises.

Failure, by the provider, to comply with all of the safeguarding arrangements listed will lead to termination of the agreement.

The external provider must provide proof of appropriate public liability insurance before the event or sessions booked.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance *'After school clubs, community activities, and tuition (safeguarding guidance for providers)' (February 2026)*.

ADDITIONAL REPORTING OBLIGATIONS

In addition to the reporting requirements set out elsewhere in this policy (reporting concerns to the DSL, making referrals to children's social care and/or the police, and reporting to the LADO), the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation. The principal additional reporting obligations are set out below.

- Disclosure and Barring Service (DBS) - The School will refer to the DBS as soon as possible any person who has harmed, or poses a risk of harm to, a child, or there is reason to believe has committed a listed offence, and who has been removed from working in regulated activity (paid or unpaid) or would have been removed had they not resigned.

- Teaching Regulation Agency (TRA) - Separate consideration will given as to whether a referral to the TRA should be made where a teacher has been dismissed for serious misconduct, or might have been dismissed had they not resigned.

- Ofsted - The School will inform Ofsted within 14 days of:
  - any significant event which is likely to affect the suitability of any person in regular contact with children on the premises where childcare is provided; and/or
  - any allegation of harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).]
- Charity Commission - the School will report all serious incidents to the Charity Commission without delay.

OPERATION ENCOMPASS

The School is part of Operation Encompass, under which the police have a statutory duty to notify the School if they have reasonable grounds to believe that a pupil may be a victim of domestic abuse. This duty applies in respect of all children connected to a household where police attended a domestic abuse incident, including children who were not physically present at the time of the incident.

The information should be shared prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and include the child's details, their relationship to the perpetrator and the voice of the child, such as what they are saying and how they are behaving.

The School's Key Adult/DSL and their deputy have completed the National Online Operation Encompass Key Adult training. All staff are encouraged to undertake the online training. The Key Adult/DSL will provide training for all staff and Governors about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children.

We ensure our parents are fully aware that we are an Operation Encompass setting including when a new child joins the School.

The Safeguarding Governor reports on Operation Encompass in the termly/annual report to Governors. All information is anonymised for these reports.

EARLY YEARS PROVISION

The School adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding safer sleeping arrangements, paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

Safer sleeping arrangements include:

- firm, flat, waterproof mat;
- individual, hypoallergenic sleeping bags;
- mats always placed within sight and hearing of staff

Paediatric first-aid training:

- all teaching staff, including EYFS staff and lunchtime supervisors hold a current Paediatric First Aid certificate ensuring a suitably trained member of staff is available at all times when children are present, including during off-site trips;
- a clear staff training log to track 3-year renewal cycle for paediatric first aid is maintained;
- first aid kits are stocked and kept in designated, highly visible locations, out of children's reach but easily accessible to trained staff.

Safer eating arrangements:

- classroom and dining hall layout allows staff to keep children always within sight and hearing while eating;
- staff are seated with and directly observing children, not performing administrative tasks or prepping food with their backs turned;
- children sit at age-appropriate, low tables and chairs where children can sit with feet flat on the floor to support an upright posture, which lowers choking risks;
- low-level sinks, directly accessible from the classroom areas are provided, for handwashing, to encourage seamless hygiene routines before and after meals;
- fresh drinking water readily available in the classroom areas.

Children's Privacy: Toileting & Nappy Changes

- changing areas and toilets have direct easy access from the learning areas; with low-level partitions and doors, or strategic practitioner positioning (using their own body as a screen) so the child's body is hidden from general view while the staff member remains fully visible and audible to the rest of the room;
- anyone providing unsupervised intimate care has undergone an enhanced criminal record check with barred list monitoring;
- dedicated nappy changing unit and dual adult- and child-height handwashing facilities to avoid cross-contamination with food prep spaces.

Designated Safeguarding Lead for the EYFS

The Designated Safeguarding Lead who takes lead responsibility for safeguarding children in the early years settings is Mabintou Bah.

Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found in the Mobile Phone and E-Safety Policies.

Staff are not permitted to use their personal mobile devices or cameras in School, other than in the staffroom and school office.

Staff who wish to use take photographs or video of pupils (whether on a personal or School device) must first speak with the Headteacher to obtain their approval before taking any image of a pupil.

Staff who wish to use their personal mobile devices or cameras in School for any other reason must first speak with the Headteacher. Staff who act in breach of this may be subject to disciplinary action.

Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Headteacher.

Screen use

The School has regard to Government guidance on screen use for children in the early years, including the impact of screen time on children's health, development and wellbeing.

The School's approach to screen use in the EYFS setting is age-appropriate and is set out in the School's EYFS Policy.

Staff in the EYFS setting are aware of the risks associated with excessive or inappropriate screen use for young children and take steps to manage and limit children's exposure to screens in line with the guidance.

Safeguarding training

The School ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework (July 2026) and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework (July 2026).

The School's safeguarding training will be renewed every two years and the School will consider whether staff need to undertake annual refresher training during any two-year period and to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at the school.

Disclosure obligation

All staff and prospective staff are informed that they have an ongoing obligation to disclose to the School any information that may affect their suitability to work with children. This includes, but is not limited to, any cautions, convictions, relevant orders, or any other matter that may affect their suitability.

This requirement is communicated at the point of recruitment and is reiterated to existing staff at regular intervals.

Positive Handling, Reasonable Force and Restrictive Interventions

The School recognises that, in limited circumstances, staff may use reasonable force or restrictive interventions in accordance with statutory guidance to prevent injury, serious damage to property, disorder or harm.

Any use of reasonable force or restrictive intervention will be proportionate, necessary, reasonable, recorded and reviewed.

Particular consideration will be given to children with SEND, medical conditions and mental health needs. Individual behaviour support plans may be used to reduce the need for restrictive interventions wherever possible.

The School's Positive Handling and Physical Intervention Policy should be read alongside this safeguarding policy.

The School does not use seclusion as a safeguarding strategy. Where pupils require access to quiet or safe spaces, these arrangements will be proportionate, monitored, time-limited and managed in accordance with the School's behaviour, SEND and safeguarding procedures.

APPENDIX 1: TYPES AND SIGNS OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

Recognising concerns

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others, for example where children see, hear or experience the effects of domestic abuse.

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events and often overlap and can put children at risk. Staff should understand that children can experience more than one type of harm simultaneously. Therefore, staff should always be vigilant and always raise any concerns with the DSL.

Some children may disclose that they are being abused, exploited or neglected (see Appendix 2 for advice on receiving a disclosure). Others may not feel ready or know how to tell someone and/or may not recognise their experiences as harmful. Children may show signs or act in ways they hope adults will notice and react to, rather than disclosing verbally. A concern may also come to light through direct observation, a report from a friend or by overhearing conversations.

Some children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Some children may face additional barriers to recognising or reporting abuse.

In particular:

- Children with special educational needs and/or disabilities (SEND) or certain health conditions may not outwardly show signs of abuse and may have difficulties in communicating about abuse, neglect or exploitation. Staff should not assume that indicators of possible abuse (such as changes in behaviour, mood or injury) relate solely to the child's condition without further exploration.
- Children may face barriers to reporting because of their vulnerability, disability, sex, ethnicity, sexual orientation or language.
- Some children particularly Black children may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed (known as 'adultification bias').
- Children may not recognise their experiences as abusive or harmful, particularly in the context of exploitation, online abuse or harmful sexual behaviour.
- Abuse, neglect and exploitation can take place wholly online, or technology may be used to facilitate offline abuse. Staff should be alert to concerns arising from children's online activity and behaviour.

Extra-familial Harm

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as "extra-familial harm." Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults and harm may be perpetrated or facilitated by individuals or groups.

Forms of extra-familial harm include:

- child criminal exploitation (such as county lines and financial exploitation);
- serious violence;
- modern slavery and human trafficking;
- online harm;
- sexual exploitation (including group-based child sexual exploitation);
- child-on-child abuse (including discriminatory behaviour such as racism, faith-targeted abuse and other prejudice-based incidents, sexual abuse and other forms of harmful behaviour displayed by children towards their peers);
- domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse and stalking); and
- the influences of extremism which could lead to radicalisation.

Children of all ages can experience extra-familial harm.

While any child can experience harm outside the home, children with special educational needs or disabilities, those missing from home, care or education, looked after children, and those with previous experience of abuse or neglect, may be at greater risk of harms such as sexual or criminal exploitation. Perpetrators, including those acting in organised groups, may purposefully target children who are already vulnerable.

Signs of Abuse

Safeguarding issues can often overlap and can put children at risk of harm.
The following are possible general indicators that a child may be at risk. This list is not exhaustive, and further guidance is also given in relation to specific safeguarding issues later in this Appendix.

Staff should always be vigilant and report any concern even where the indicators below are not present:

- unexplained injuries, bruises or marks, or injuries for which there is no reasonable or consistent explanation;

- a sudden or significant change in behaviour (which may include becoming withdrawn, aggressive, anxious, clingy, or displaying extreme or challenging behaviour);
- appearing neglected (e.g. consistently poor hygiene, being hungry, or inadequately clothed);
- making a direct disclosure or asking questions or making comments which give rise to concerns;
- a deterioration in general wellbeing, development, or academic performance;
- being reluctant to go home, or making strong efforts to avoid specific family members or other adults;
- regular absences from school, or being regularly late, without satisfactory explanation;
- drug taking and/or alcohol misuse;
- signs of self-harm, disordered eating, or other indicators of mental health difficulties;
- unexplained gifts, money, or new possessions (which may indicate exploitation);
- serious violence, criminal exploitation (including that linked to county lines), radicalisation;
- consensual and non-consensual making or sharing of nudes or semi-nudes; and
- inappropriate sexual or sexualised behaviour, or language that is not age appropriate.

Types of Abuse

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

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

Sexual abuse: involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact such as acts of penetration, whether that is with parts of a person's body or an object (e.g. rape or assault by penetration) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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

Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific Safeguarding Issues

The following are identified as specific safeguarding issues in KCSIE. Further advice and links to additional guidance and resources can be found in KCSIE Annex A (and/or in KCSIE Part 1 and Part 5).

In all cases, if staff have any concern about a child, they should follow the procedures set out in Section 2 of this policy.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

CCE and CSE are both forms of abuse. They occur when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in criminal or sexual activity.
This may be:

- in exchange for something the victim needs or wants (for example, money, gifts or affection);
- for the financial or other advantage of the perpetrator or facilitator (for example, increased status); and/or
- through violence or the threat of violence.

CCE and CSE can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Children may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

CSE and CCE can affect any child regardless of their background, age or sex. Staff should be aware that both boys and girls can be victims and perpetrators of exploitation, and that the experience of girls who are criminally exploited can be very different to that of boys. Children who are criminally exploited may also be at higher risk of sexual exploitation.

The victim may have been exploited even if the activity appears consensual. It is not possible for a child to consent to their own exploitation, abuse or trafficking, and they may not recognise that it is happening to them. It is important in all cases of CSE and CCE that the child is recognised as a victim, even where they may have been involved in criminal activity.

If staff have any concerns that a child may be at risk of, or involved in, sexual or criminal exploitation (including county lines), they should report their concerns to the DSL immediately, following the procedures set out in this policy. Where a child may have been moved/trafficked for the purpose of exploitation, this may constitute modern slavery (see below) and a referral to the National Referral Mechanism should also be considered.

Child Criminal Exploitation: CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions,
- associating with other children involved in exploitation,
- suffering from changes in emotional wellbeing,
- misusing drugs and alcohol,
- going missing for periods of time or regularly coming home late, and/or
- regularly missing school or not taking part in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other forms of “deal line”. Children and vulnerable adults can be exploited to sell, move and store drugs and money. Children can be targeted and recruited into county lines in a number of locations, including schools, and/or online using social media.

Indicators for both CSE and CCE as detailed here may be applicable and additional specific indicators for involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters; and/or
- have their bank accounts used to facilitate drug dealing.

Child sexual exploitation: CSE is a form of child sexual abuse, which may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may also include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can affect any child who has been coerced into engaging in sexual activities (including 16- and 17-year-olds who can legally consent to have sex). It can occur

over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. The victim may have been sexually exploited even if the sexual activity appears consensual. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "Child sexual exploitation: guide for practitioners". The Children's Society and Home Office have also published guidance on Preventing Child Sexual Exploitation.

Group-based child sexual exploitation: Group-based is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes, for example, introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child, or allowing their property to be used for sexual activities with a child. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2025)*".

Serious violence

Children who are involved in committing violence may themselves be victims in need of support. The indicators which may signal children are at risk from, or are involved in committing, serious violence include:

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in educational performance,
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and

- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male,
- having been suspended, spent time in Alternative Provision or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery,
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence.

Further guidance for schools includes: the Home Office's *Criminal exploitation of children and vulnerable adults: county lines guidance*; the Youth Endowment Fund (YEF) *practical guidance* for schools and an accompanying *self-assessment tool*.

The Home Office and Ministry of Justice's Government Guidance for Child Knife Possession Offences outlines the Government's expectations when a child is found in possession of a knife or bladed article.

Honour or faith-based abuse (including FGM)

This encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

If staff have a concern that a pupil may be at risk of honour-based abuse and/or FGM, they should speak to the DSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

FGM: FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.

- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the reporting child or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School's usual safeguarding procedures and report to the DSL.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used. It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023).* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation and Extremism

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those different faiths and beliefs.
Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. Guidance on low, medium and high-risk behaviours is set out here: Managing risk of radicalisation in your education setting - GOV.UK.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either:

- 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line); or
- 'cyber dependent' (crimes that can be committed only by using a computer) such as unauthorised access ('hacking'); denial of service attacks; and making, supplying or obtaining malware.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Domestic abuse

Domestic abuse is one of the most prevalent forms of abuse. It can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. It can include psychological, physical, sexual, financial, economic or emotional abuse, as well as controlling or coercive behaviour. Anyone can be a victim of domestic abuse (although under the statutory definition both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected").

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The School will consider domestic abuse as a safeguarding concern even where the child was not physically present when the incident occurred.

Young people can also experience domestic abuse within their own intimate relationships (sometimes referred to as 'teenage relationship abuse'). Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both the reporting child and the reported child should be offered support.

The school should receive a notification under Operation Encompass for any child connected to a household where police have attended a domestic abuse incident.

Children who are absent from education

A child being absent from school is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE (including involvement in county lines). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, honour or faith-based abuse or risk of forced marriage. Staff should refer to Section 4 of this policy for the school's procedures for dealing with children who are absent from education, including persistently or for prolonged periods.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Homelessness

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School is aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property.

The School may receive a notification from the local housing authority when a child has been placed in temporary accommodation, but this does not replace existing safeguarding duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the DSL in the usual way

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children, 5–11-year-olds and 12–17-year-olds, available on the gov.uk website. The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison

Approximately 193,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The Prisoners' Families Helpline provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Further support for families can be found at the Prisoners' Families Helpline website.

APPENDIX 2:
RECEIVING A DISCLOSURE AND RECORDING CONCERNS

Receiving a disclosure

If staff receive a disclosure from a child, they should:

- listen carefully;
- avoid asking leading questions;
- observe the child's behaviour;
- reassure the child that the allegation/complaint will be taken seriously and that they will be supported and kept safe;
- ensure that the child is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken; and
- make a written note as soon as possible including where the disclosure was made, who else was there, what was said and done and by whom (see below).

Where the disclosure relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or DDSL).

Recording Concerns

All concerns must be recorded in writing. The record should be factual and should contain the following information as a minimum:

- child's name and date of birth;
- date and time the concern arose (e.g. time of any disclosure / observation / incident);
- clear, factual summary of the concern, including details of any disclosure or observations;
- details of any action taken or decisions made, with reasons;
- details of how the concern was resolved and any outcome; and
- the name and role of the person recording the concern.

Paper records should also be signed and dated.
[There is a template record and body map below.]

Record of Concerns and Body Map (p1)

CONFIDENTIAL — Safeguarding Record

Child's name:	
Date of birth:	
Class/Form/Tutor group:	
Date and time of the disclosure / observation / incident giving rise to the concern:	
Date and time record made:	
Name of person completing form:	
Role/position:	
Nature of concern: If a disclosure was made include location, who else was there, what was said and done and by whom [If an injury was observed complete a body map and give a full written description of the injuries and any explanation given by the child]	
Any other relevant observations (including whether a body map has been completed and attached):	
Action taken (e.g. reported to DSL): Include reasons for actions or decisions made, if applicable	
Signature:	
Date:	

Body Map
This body map is for recording visible marks, injuries or signs of physical harm observed on a child. It provides a visual record that helps professionals work together when deciding whether there is a safeguarding concern and documents the frequency and location of injuries.

Record of Concerns and Body Map (p2)

Time form received by Designated Safeguarding Lead:

Action taken by Designated Safeguarding Lead:

Rationale for actions taken:

Referred to:

Date: Time:

Have Parents been informed? Yes / No (If No, state reason)

Feedback given to:

☐	☐	☐	☐	☐
Pastoral team	Family Help	Child	Person who recorded disclosure	Other

Further Action Agreed:

DSL Signature:

Printed Name:

Date

Appendix 2a –Body Plans

IMPORTANT

- NEVER photograph a child's injuries.
- NEVER ask to see injuries that are covered by clothing.
- Record injuries as soon as possible — they can change quickly.
- This body map should be completed at the same time as the concern reporting form and passed to the DSL immediately.

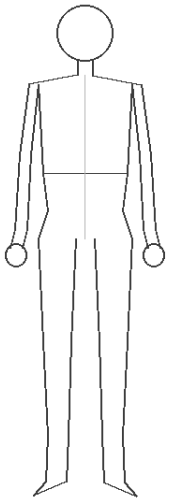
What to Record

- Date and time injuries first observed
- Date and time the record was made (if different from above)
- Location of injuries on the body map diagrams (mark with an X and number each mark)
- Size, shape and colour of marks/injuries
- Any explanation given by the child (record their exact words where possible)
- Name and role of the person completing the form

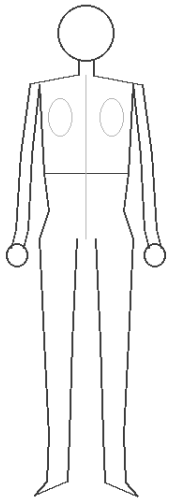
Body Map

Mark the location of injuries with an X. Number each mark to correspond with description above.

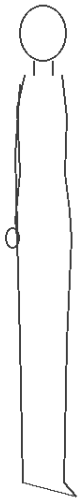
FRONT VIEW



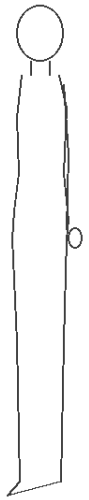
BACK VIEW



LEFT SIDE



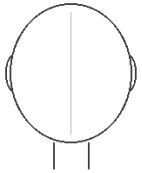
RIGHT SIDE



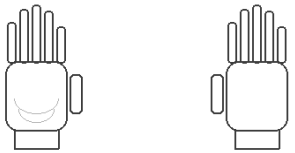
HEAD (FRONT)



HEAD (BACK)



HANDS (Left palm / Right back)



Indicate clearly where the injury was seen and attach this to the referral form.

APPENDIX 3:
PROCEDURES FOR MANAGING ALLEGATIONS AGAINST STAFF (INC. LOW-LEVEL CONCERNS)

This Appendix comprises:

1. Procedures for managing allegations against staff
2. Procedures for managing allegations against supply staff and contractors
3. Procedures for managing low-level concerns

1. The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follow DfE statutory guidance and Local Child Safeguarding Board arrangements.
They apply when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns.

Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO.

Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Headteacher. Where the Headteacher is absent or is the subject of the allegation, reports should be made to the Chair of Governors. Where the Headteacher is the subject of the allegation, the Headteacher must not be informed of the allegation prior to contact with the Chair of Governors and LADO.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual who is the subject of the allegation will be considered on a case -by -case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
    - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
    - providing an assistant to be present when the individual has contact with children;
    - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
    - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes

account of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or

- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

6. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

    Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS and TRA where appropriate.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.
Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained

on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headteacher will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

2. Procedure for managing allegations about supply staff and contractors

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead on handling allegations to ensure appropriate action is taken. The School will be responsible for gathering the facts and managing the safeguarding process, but agencies should be fully involved and will usually lead on any disciplinary action. The School will co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the TRA).

3. Procedures for Managing Low-Level Concerns

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

If a concern is raised by a third party, the Headteacher will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way. The school will consult with the LADO to determine whether concerns meet the allegation threshold or should be managed as low-level concerns.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it. The concern, which is raised, might not meeting the LADO Threshold and could be passed on to the Education Safeguarding Team for consideration and support (education.safeguarding@newham.gov.uk).

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with data protection laws at all times. The information will be retained until the individual has left employment.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance. The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies.

Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will the follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.
If the Headteacher (or Chair of Governors as appropriate) is in any doubt as to whether a low-level concern in fact meets the harm threshold, they will consult with the LADO.

APPENDIX 4: PROCEDURES FOR MANAGING ALLEGATIONS OF CHILD-ON-CHILD SEXUAL HARASSMENT AND SEXUAL VIOLENCE

Identifying sexual harassment, sexual violence and harmful sexual behaviours

Sexual violence and sexual harassment (as defined below) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual harassment: is 'unwanted conduct of a sexual nature' such as sexual comments, remarks, jokes and online sexual harassment which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual making and sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to

obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Harmful sexual behaviour is defined as: Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term "harmful sexual behaviour" is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context.

Response Procedures

The School will respond to all signs, reports and concerns of harmful sexual behaviours, sexual harassment and sexual violence, including where behaviour falls at the lower end of the continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support. Sexual behaviour between children may be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the Safeguarding Children Board referral process.

The School will follow the procedures in Appendix 5 when responding to an allegation that nude or semi-nude images and/or videos including those generated using AI have been made or shared.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Newham Multi-Agency Safeguarding Hub (MASH) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be

interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Newham Multi-Agency Safeguarding Hub (MASH), parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.

Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LSCB and/ or the police, as appropriate. The School will have regard to the procedures set out in KCSIE at all times.

The reporting child may ask the School not to tell anyone about the sexual violence or sexual harassment.

Advice should be sought from the DSL who should consider:

- parents or carers should normally be informed unless doing so would put the reporting child at greater risk;
- the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and
- whether a crime has been committed. Ultimately, the DSL will balance the reporting child's wishes against their duty to protect the reporting child and other children.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect

them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport.

The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headteacher will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

Additional Resources

The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.
The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.
Beyond Referrals | Contextual Safeguarding provides a school self-assessment toolkit and guidance for addressing HSB in schools.

Stop It Now – Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

APPENDIX 5: NUDE AND SEMI-NUDE IMAGES AND/OR VIDEOS (INCLUDING AI-GENERATED) DETAILED RESPONSE PROCEDURES

For this purpose, 'making or sharing nude and semi-nude intimate images'' refers to the creation, sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

The term 'nudes' is often used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery.
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
- image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes.

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nude and semi-nude images and/or videos being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

The motivations for making, taking and sharing nude or semi-nude images and/or videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nude or semi-nude intimate images and/or videos online and share them claiming to be from a peer.
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new intimate image and/or video of a young person.

- images created or shared are used to abuse or blackmail peers. Situations could include:
    - children and young people selling nude or semi-nude images and/or videos of others online;
    - children and young people coercing a peer into sharing nude or semi-nude images and/or videos to blackmail them for money, further images, or force them into illegal activity; or
    - children and young people hacking a peer's account to share images more widely without consent to publicly shame.
- children and young people create and share nude or semi-nude images and/or videos with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

As set out in Section 4, all incidents involving the making or sharing of nude or semi-nude images and/or videos (including AI-generated), will receive a safeguarding response regardless of whether they are consensual or non-consensual.

The School will take a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of the making or sharing of nude or semi-nude images and/or videos including those generated using AI s. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.

- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The images involve sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nude or semi-nude images and/or videos including those generated using AI, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nude or semi-nude images and/or videos including those generated using AI being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework.

Any decision in this regard will be made by the DSL (or equivalent) with input from the Headteacher. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

APPENDIX 6: FLOWCHART REPORTING A SAFEGUARDING CONCERN

START: You have a concern about a child's safety or welfare

↓

◆ DECISION
Is the child in immediate danger or at risk of harm?

NO ↓

Report your concern to the DSL (or DDSL in their absence) immediately. Use the School's reporting form.

↓

◆ DECISION
Is the DSL/DDSL available?

YES ↓

DSL ASSESSMENT
DSL considers the concern and determines next steps (with reference to local authority thresholds)

↓

DSL determines next steps — three possible outcomes:

✅ OUTCOME 1
Manage internally – School puts pastoral

YES ↓

IMMEDIATE ACTION
Call 999 (Police) and/or make an immediate referral to Children's Social Care. Do not delay. If you were unable to inform the DSL before, do so as soon as possible afterwards.

NO ↓

DSL/DDSL UNAVAILABLE
Speak to a member of SLT. If the concern cannot wait, contact Children's Social Care directly.
Inform the DSL as soon as they are available.

⚠ OUTCOME 2
Early Help / Family Help – DSL coordinates

STAFF CONCERNS PATHWAY

↓

◆ DECISION
Is the concern about a member of staff (including supply staff, volunteers or contractors)?

YES ↓

Report to the Head immediately.
Head consults LADO within one working day.

↓

If the concern is about the Head:
Report to the Chair of Governors who consults LADO.

⛔ OUTCOME 3
Referral to Children's Social Care and/or Police –

support in place. DSL monitors and reviews. Escalate if concern persists.	assessment and referral to local services. Keep under review.	DSL makes referral within 24 hours (one working day). Written confirmation sent. Await acknowledgement.

Remember: Anyone can make a referral to Children's Social Care or the Police at any time. You do not need parental consent.
Record all concerns, discussions and decisions in writing.

KEY
DSL = Designated Safeguarding Lead | DDSL = Deputy Designated Safeguarding Lead | LADO = Local Authority Designated Officer | SLT = Senior Leadership Team



Appendix 7 - Statutory framework and content/location of embedded safeguarding

Policy / Legislation	Hyperlink
Keeping Children Safe in Education (HMG, 2026)	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
London Child Protection Procedures	http://www.londoncp.co.uk/
Working Together to Improve School Attendance (2024)	https://www.gov.uk/government/publications/working-together-to-improve-school-attendance
Working Together to Safeguard Children (HMG, 2026)	https://www.gov.uk/government/publications/working-together-to-safeguard-children—2
Education Act 2002	https://www.legislation.gov.uk/ukpga/2002/32/contents
Domestic Abuse Act 2021	https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted
Modern Slavery Act 2015	https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted
What to Do If You're Worried a Child Is Being Abused (HMG, 2015)	https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused
Counter-Terrorism and Security Act (HMG, 2015)	https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted
The Prevent Duty – Departmental Advice for Schools and Childcare Providers (DfE, 2015)	https://www.gov.uk/government/publications/prevent-duty-guidance
Prevent Duty Guidance for Further Education Institutions (HMG, 2024)	https://www.gov.uk/government/publications/prevent-duty-guidance
Serious Crime Act 2015	https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted
Sexual Offences Act 2003	https://www.legislation.gov.uk/ukpga/2003/42/contents
Voyeurism (Offences) Act 2019	https://www.legislation.gov.uk/ukpga/2019/2/contents/enacted
Information Sharing Advice for Practitioners (DfE, July 2018)	https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
Data (Use and Access) Act 2025	Data (Use and Access) Act 2025
Education (Pupil Registration) Regulations 2006	https://www.legislation.gov.uk/uksi/2006/1751/contents/made
General Data Protection Regulation (UK GDPR, 2018)	https://www.gov.uk/data-protection
Searching, Screening and Confiscation (DfE, 2018)	https://www.gov.uk/government/publications/searching-screening-and-confiscation
Use of Force – DfE Guidance	https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools
Children Act 1989	https://www.legislation.gov.uk/ukpga/1989/41/contents
Children Act 2004	https://www.legislation.gov.uk/ukpga/2004/31/contents
Children and Social Work Act 2017	https://www.legislation.gov.uk/ukpga/2017/16/contents/enacted

Homelessness Reduction Act 2017	https://www.legislation.gov.uk/ukpga/2017/13/contents/enacted
Preventing and Tackling Bullying (DfE, 2017)	https://www.gov.uk/government/publications/preventing-and-tackling-bullying
Female Genital Mutilation Act 2003. (Also, S4. Serious Crime Act)	https://www.legislation.gov.uk/ukpga/2003/31/contents



Appendix 8 – Professional Curiosity

What is Professional Curiosity?
Professional curiosity is the capacity and responsibility to explore and understand what is happening within a child's life rather than accepting information at face value.
It involves respectfully questioning, observing, checking, verifying and seeking clarification when concerns arise about a child's welfare, safety or wellbeing. Professional curiosity helps staff identify children who may be at risk of abuse, neglect, exploitation or other safeguarding concerns at the earliest opportunity.

Why is Professional Curiosity Important?

Safeguarding concerns are not always obvious, and children may be unable, unwilling or not ready to disclose what is happening to them.
Maintaining professional curiosity enables staff to:

- identify emerging concerns early
- recognise patterns of behaviour or presentation
- understand the lived experience of the child
- challenge assumptions respectfully
- prevent concerns from escalating
- ensure children receive the right help at the right time

Professional curiosity supports effective safeguarding practice and contributes to a strong safeguarding culture throughout the school.

Professional Curiosity in Practice

Professional curiosity may include

- noticing unexplained changes in behaviour, presentation or attendance
- seeking clarification where explanations appear inconsistent
- respectfully exploring concerns with children, parents or carers
- checking information with other professionals
- considering the wider context of a child's experiences
- asking appropriate questions rather than making assumptions
- following up concerns which remain unresolved
- remaining alert to signs of abuse, neglect, exploitation or harmful behaviours

Examples of When Professional Curiosity May Be Required

Staff should consider using professional curiosity where

- a child frequently arrives at school hungry, tired or unprepared
- attendance deteriorates without clear explanation
- a child presents with unexplained injuries
- explanations provided by adults or children are inconsistent
- concerns are reported repeatedly by different members of staff
- a child appears fearful, withdrawn or anxious
- information from different agencies conflicts



- there are concerns regarding exploitation, county lines, radicalisation or online harms
- there is evidence of disguised compliance by parents or carers
- a child's presentation appears inconsistent with information provided by adults

Questions Staff May Ask Themselves

When concerns arise, staff should consider
- What is the child's lived experience?
- What am I worried about?
- What am I seeing, hearing or noticing?
- What is the evidence for my concerns?
- What information may be missing?
- Have I checked my assumptions?
- Do I need further clarification?
- Have I shared my concerns with the Designated Safeguarding Lead?

Recording and Reporting

Professional curiosity should always be supported by:
- timely recording of concerns
- clear factual observations
- discussion with the Designated Safeguarding Lead
- information sharing where appropriate
- ongoing review of concerns

Staff should never ignore concerns because they appear minor or because someone else may be dealing with them. If concerned, staff should always speak to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

Our Commitment

The school promotes a culture in which professional curiosity is encouraged, valued and supported. Staff are expected to remain professionally curious, exercise professional judgement and always maintain a child-centred approach to safeguard and promote the welfare of children.

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Appendix 9 – Recognising and Responding to Disguised Compliance

Our Commitment

The School recognises that effective safeguarding requires professional curiosity, respectful challenge and a continued focus on the lived experiences of children.

All staff are expected to remain alert to the possibility of disguised compliance and to raise concerns whenever they believe that progress for a child is not genuine, sustained or sufficient.

What is Disguised Compliance?

Disguised compliance occurs when a parent, carer or family appears to engage positively with professionals and services but does not make meaningful, sustained or sufficient changes to improve outcomes for the child.
Professionals may be reassured by parental cooperation, attendance at meetings, or verbal agreement to actions, while the child's circumstances remain unchanged or continue to deteriorate.
Safeguarding practice should focus on the lived experience, safety and outcomes of the child rather than the apparent level of adult engagement.

Why is Disguised Compliance Important?

Disguised compliance can:

- delay appropriate intervention
- mask ongoing abuse or neglect
- create a false sense of reassurance for professionals
- result in risks not being fully recognised
- prevent children from receiving the support they need

Staff should remain professionally curious and consider whether genuine, sustained change has occurred for the child.

Possible Indicators of Disguised Compliance

The following behaviours do not automatically indicate disguised compliance but should encourage professional curiosity and further exploration:

Engagement with Professionals

- repeatedly agreeing to actions but failing to complete them
- attending meetings but not implementing agreed plans
- cancelling, rearranging or avoiding appointments
- only engaging with professionals immediately before reviews or visits
- demonstrating temporary improvements which are not sustained

Explanations and Information

- providing inconsistent explanations
- providing different information to different professionals



- minimising concerns raised by professionals
- blaming other agencies, schools, professionals or the child
- focusing discussions on adults rather than the child

Home and Family Presentation

- presenting a significantly improved picture during planned visits
- appearing overly cooperative without evidence of change
- preventing professionals from speaking with children alone where appropriate
- avoiding discussion of concerns relating directly to the child

Child-Focused Indicators

- attendance concerns continuing despite assurances
- neglect indicators remaining unchanged
- repeated safeguarding concerns from different staff members
- no evidence that the child's day-to-day experiences have improved
- ongoing concerns despite apparent parental cooperation

Questions to Consider

When concerns arise, staff should ask:

About the Child

- What has changed for the child?
- Is the child safer?
- Has the child's lived experience improved?
- What evidence supports this?

About Professional Judgement

- Am I being reassured by parental engagement rather than outcomes?
- What concerns remain unresolved?
- Do I have sufficient evidence that risks have reduced?
- Have I considered alternative explanations?

About Multi-Agency Working

- Are all professionals receiving consistent information?
- Are there recurring concerns across different agencies?
- Does the level of professional concern match the level of intervention?

Responding to Disguised Compliance

Where disguised compliance is suspected, staff should:

- maintain professional curiosity
- record concerns factually and promptly
- focus on outcomes for the child



- avoid making assumptions
- seek clarification where needed
- discuss concerns with the Designated Safeguarding Lead (DSL)
- continue to monitor and review progress
- share relevant information appropriately with partner agencies

The measure of success is not how well adults engage with professionals, but whether the child's circumstances, safety and wellbeing have genuinely improved.



Appendix 10 - Safeguarding and Education Resources

Resource	Description / Notes	Link
Keeping Children Safe in Education (KCSIE) 2026	Statutory guidance effective from 1 September 2026	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Working Together to Safeguard Children (HM Government, 2026)	Multi-agency statutory guidance for safeguarding children.	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
Working Together to Improve School Attendance (DfE, 2024)	Statutory from September 2025; outlines expectations for attendance management.	https://www.gov.uk/government/publications/working-together-to-improve-school-attendance
Alternative Provision – DfE Statutory Guidance	Updated 5 February 2025, this guidance applies to all educational settings providing alternative provision (AP), including PRUs, academies, and independent providers. It outlines responsibilities for exclusions, behaviour interventions, and unregistered AP use .	https://www.gov.uk/government/publications/alternative-provision
Education for Children with Health Needs Who Cannot Attend School – DfE Statutory Guidance	Updated 14 December 2023, this guidance explains how local authorities must ensure children with health needs receive suitable education. It applies to children of compulsory school age who cannot attend school due to illness or disability .	https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school
DfE: Generative AI – product safety expectations	Guidance on safe use of generative AI in educational settings.	https://www.gov.uk/government/publications/generative-ai-product-safety-expectations
UKCIS: Education for a Connected World	Age-appropriate framework for teaching online safety.	https://www.gov.uk/government/publications/education-for-a-connected-world
NPCC: When to call the police –	Practical advice on when police involvement is appropriate.	https://www.npcc.police.uk/SysSiteAssets/media/downloads/publicat

guidance for schools and colleges		ions/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf
CSA Centre – resources on child sexual abuse and harmful sexual behaviour	Specialist materials and training on CSA and HSB.	https://www.csacentre.org.uk/
CSA Hub	Centralised access to CSA-related tools, guidance, and support.	https://www.csahub.org.uk
The Children's Society – Preventing Child Sexual Exploitation guidance	Guidance to help identify and prevent child sexual exploitation.	https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation
Lucy Faithfull Foundation – 'Shore Space'	Confidential support for concerns about sexual behaviour.	https://www.lucyfaithfull.org.uk/shore-space.htm
KCSIE 2026 Webinars	Free webinars to support implementation of the new guidance.	https://safeguarding.network
KCSIE Knowledge Check	Verifies staff understanding of KCSIE 2026 and related policies.	https://safeguarding.network
Mandatory Reporting Implementation Pack	Tools to support rollout of mandatory CSA reporting.	https://safeguarding.network
Two-Year Rolling KCSIE Curriculum	Bite-size training modules for whole staff teams.	https://safeguarding.network
State of Childhood Vulnerability Report (2025)	Highlights post-pandemic challenges for vulnerable children.	https://centreforyounglives.org.uk
Youth Endowment Fund – Beyond the Headlines 2025	Trends in youth violence and safeguarding implications.	https://youthendowmentfund.org.uk
Online Harm in Schools – POSH Annual Report 2024	Insight into digital safeguarding challenges.	https://saferinternet.org.uk

Newham Family Help Offer	Support for families and students in Newham	http://www.newhamlscb.org.uk/wp-content/uploads/2018/02/04892-Pathways_A4-HIRES.pdf Newham Families Local Offer
Prevent Referral (2025)	How to refer a student to prevent	Making a referral to Prevent - GOV.UK
Contextual Safeguarding	Resources and advice for contextual safeguarding	https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding



Appendix 11: Newham Safeguarding Self-Assessment Matrix

Purpose

This self-assessment tool supports schools, colleges and governing bodies in reviewing compliance with safeguarding requirements and KCSIE 2026 expectations.

1.Safeguarding Culture

Area	RAG	Evidence
Is safeguarding clearly embedded within the culture of the school?		
Is safeguarding a standing item on leadership and governor agendas?		
Do staff understand that safeguarding is everyone's responsibility?		
Is professional curiosity promoted and discussed?		
Are children able to identify trusted adults in school?		
Are safeguarding themes visible throughout the curriculum?		

2.Leadership and Governance

Area	RAG	Evidence
Has the Child Protection and Safeguarding Policy been reviewed and approved?		
Has the safeguarding governor received safeguarding training?		
Is safeguarding reported regularly to governors?		
Are safeguarding audits undertaken annually?		

Are governor safeguarding visits undertaken and recorded?		
Is there evidence of challenge and scrutiny by governors?		

3. Designated Safeguarding Lead

Area	RAG	Evidence
Is a trained DSL in post?		
Are trained Deputy DSLs in post?		
Are robust DSL cover arrangements in place?		
Is there a safeguarding inbox/email system?		
Is DSL supervision and safeguarding oversight evident?		

4. Family Help and Multi-Agency Working

Area	RAG	Evidence
Do staff understand Family Help pathways?		
Are Family Help referrals being used appropriately?		
Is the school represented at multi-agency meetings?		
Are chronologies maintained where appropriate?		
Is attendance at child protection and CIN meetings prioritised?		

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5. Vulnerable Children

Area	RAG	Evidence
Are children with a social worker identified?		
Are children in kinship care identified?		
Are young carers identified and supported?		
Are pupils with SEND appropriately safeguarded?		
Are children with medical needs appropriately safeguarded?		
Are children in temporary accommodation identified?		
Are attendance concerns reviewed through a safeguarding lens?		

6. Child on Child Abuse

Area	RAG	Evidence
Do staff understand child-on-child abuse procedures?		
Are reporting systems accessible to pupils?		
Is child-on-child abuse recognised as a safeguarding issue for both children involved?		
Are incidents of discriminatory abuse recorded and addressed?		
Are sexual harassment and sexual violence concerns appropriately managed?		
Are risk assessments completed where required?		

7. Online Safety

Area	RAG	Evidence
Has filtering and monitoring been reviewed this academic year?		
Are online safety risks regularly reviewed?		
Have staff received online safety updates?		
Are risks relating to AI, deepfakes and FMSE understood?		
Is online safety taught through the curriculum?		
Are parents provided with online safety information?		

8. Alternative Provision

Area	RAG	Evidence
Is written safeguarding assurance obtained from AP providers?		
Does the school know where each child is educated during the school day?		
Are AP placements reviewed at least half-termly?		
Is attendance monitored?		
Are safeguarding concerns shared promptly?		
Is welfare and progress reviewed regularly?		



9. Safer Recruitment

Area	RAG	Evidence
Is the Single Central Record compliant?		
Are online searches undertaken for shortlisted candidates?		
Have recruitment staff completed safer recruitment training?		
Are volunteer checks compliant with KCSIE 2026 requirements?		
Are agency staff checks verified?		
Are trainee teacher requirements understood?		

10. Staff Conduct

Area	RAG	Evidence
Do staff understand low-level concerns procedures?		
Are low-level concerns recorded appropriately?		
Do staff understand whistleblowing procedures?		
Are safeguarding allegations managed appropriately?		
Are supply staff allegations managed in accordance with KCSIE 2026?		
Do staff understand low-level concerns procedures?		

Governor Safeguarding Challenge Questions

Area	RAG	Evidence
How do leaders know safeguarding culture is effective?		
How do pupils report safeguarding concerns?		
How do leaders know children feel safe?		

DSL and Leadership

Area	RAG	Evidence
Who covers safeguarding when the DSL is absent?		
How often does the DSL receive supervision or support?		
What are the school's biggest safeguarding risks currently?		
How does the DSL assure themselves that safeguarding records are timely, accurate and evidence professional curiosity?		

Family Help

Area	RAG	Evidence
How many children have received Family Help support this year?		
How does the school identify children needing Family Help?		
What evidence is there that interventions improve outcomes?		



Child on Child Abuse

Area	RAG	Evidence
How many incidents of child-on-child abuse have been recorded?		
How are victims supported?		
How are reported children supported?		
How does the school address discriminatory abuse, misogyny and racism		

Alternative Provision

Area	RAG	Evidence
How many pupils attend Alternative Provision?		
How does the school monitor attendance and welfare?		
How often are placements reviewed?		
How does the school assure itself that AP safeguarding arrangements remain effective?		

Online Safety

Area	RAG	Evidence
When were filtering and monitoring arrangements last reviewed?		
How does the school respond to AI-related risks?		
What training have staff received?		
What are the school's current online safeguarding concerns?		

Vulnerable Pupils

Area	RAG	Evidence
How many children currently have a social worker?		
How many young carers have been identified?		
How are children in kinship care supported?		
How are children with SEND safeguarded?		

Recruitment and Staff Conduct

Area	RAG	Evidence
Is the Single Central Record compliant?		
Have any low-level concerns been recorded this year?		
How are volunteers risk assessed?		
How are supply staff safeguarding concerns managed?		

Strategic Challenge Questions for Governors and Leaders

Area	RAG	Evidence
How do we know children are safer this year than they were last year?		
What evidence shows that safeguarding interventions improve outcomes for children?		
Which safeguarding risks worry leaders most and what are we doing about them?		
How are the voices and lived experiences of children influencing safeguarding decisions?		
If Ofsted inspected tomorrow, what safeguarding area would		

leaders most want to strengthen?		

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Appendix 12: Safeguarding Culture Indicators

Indicators of a Strong Safeguarding Culture

Staff:

- report concerns promptly
- demonstrate professional curiosity
- record concerns clearly
- challenge poor practice
- understand local processes

Children:

- know who to speak to
- feel listened to
- understand safeguarding messages
- have confidence in reporting systems

Leaders

- prioritise safeguarding
- quality assure records
- analyse safeguarding themes
- learn from incidents

Governors:

- provide challenge
- understand safeguarding risks
- receive safeguarding reports
- seek assurance