Child Protection and Safeguarding Policy 2026–2027

Including safer recruitment, allegations against staff and low-level concerns

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Mrs Debbie Norton	02085706130 head@wellington.hounslow.sch.uk
Deputy DSL	Mrs Louise Gleeson Mrs Kuldip Khalon Mrs Georgina Murphy Miss Claire Strange Miss Harkiran Koundu	Lgleeson3.313@lgflmail.org Kkhalon.313@lgflmail.org Gmurphy10.313@lgflmail.org Cstrange4.313@lgflmail.org Hkoundu1.313@lgflmail.org
Local authority designated officer (LADO)	Hounslow LADO – Safeguarding Advice and Allegations Management duty	020 8583 5730 lado@hounslow.gov.uk Use current HSCP referral form. Emergency protection: 999.
Chair of governors	Current chair: confirm before adoption (previous policy records Mrs Satbir Sidhu)	cog@wellington.hounslow.sch.uk
DfE counter-extremism helpline (not an emergency or direct Channel referral line)		020 7340 7264
Children's social care – urgent harm	Hounslow children's services	020 8583 6600, option 2 then option 3 Mon–Fri, 9am–5pm https://www.hounslow.gov.uk/child-protection/report-concern-child-professional
Children's social care – out of hours	Hounslow emergency duty service	020 8583 2222
Immediate danger / police	Emergency: 999; non-emergency: 101	Do not delay urgent protective action while recording on CPOMS.
Safeguarding governor	Confirm current appointment	Contact via school office; this role is separate from DSL.

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on Keeping Children Safe in Education (KCSIE) 2026, in force from 1 September 2026, Working Together to Safeguard Children 2026, and the Maintained Schools Governance Guide. It applies across Wellington's Infant and Junior sites, Nursery, Reception, the Ark Pathway, school-run extended provision and off-site activities. We have regard to statutory guidance and comply with applicable law and Hounslow's published multi-agency safeguarding arrangements. "Must" identifies a legal requirement; "should" identifies guidance to follow unless there is good reason not to. The source register in Appendix 5 identifies the editions used.

This policy is also based on the following legislation and statutory guidance:

- **Section 175 of the Education Act 2002**, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- **The School Staffing (England) Regulations 2009**, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- **The Children Act 1989** (and **2004 amendment**), which provides a framework for the care and protection of children
- **Section 5B(11) of the Female Genital Mutilation Act 2003**, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- **Statutory guidance on FGM**, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- **The Rehabilitation of Offenders Act 1974**, which outlines when people with criminal convictions can work with children
- **Schedule 4 of the Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulated activity' is in relation to children
- The Counter-Terrorism and Security Act 2015 and the current Prevent duty guidance and departmental advice for schools and childcare providers, concerning protection from radicalisation and involvement in terrorism. Decisions are based on evidence and individual circumstances, without stereotyping any faith or community.
- **The Human Rights Act 1998**, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- **The Equality Act 2010**, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- **The Public Sector Equality Duty (PSED)**, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- **The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018** (referred to in this policy as the "2018 Childcare Disqualification Regulations") and **Childcare Act 2006**, which set out who is disqualified from working with children
- The EYFS statutory framework for group and school-based providers, effective 1 September 2026, particularly Section 3 on safeguarding and welfare and Annex C on safeguarding training.

In addition, this policy reflects the following current statutory and DfE guidance:

- Working together to improve school attendance, July 2026 edition. This guidance has been statutory since 19 August 2024; the July 2026 update provides technical clarifications.
- Revised statutory Relationships Education, Relationships and Sex Education and Health Education guidance, effective 1 September 2026. Primary provision delivers Relationships Education and Health Education through an age-appropriate, accessible curriculum; see the school's RSHE policy.
- DfE digital and technology standards, including cyber security and information security standards, in their current published versions.
- DfE filtering and monitoring standards and the Plan technology for your school service, read with KCSIE 2026 paragraphs 173–179.
- DfE guidance on generative artificial intelligence in education and Generative AI: product safety expectations, together with current mobile phones in schools guidance, EYFS screen use guidance and Restrictive interventions, including use of reasonable force, in schools (effective 1 April 2026).

The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 govern safeguarding information processing. The Crime and Policing Act 2026 amendments to regulated activity are reflected in Appendix 2, following KCSIE 2026 Part three. Consultation proposals are not treated as current duties.

3. Definitions

Safeguarding and promoting the welfare of children means:

- 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

Promoting children's upbringing with their birth parents or, where appropriate and in their best interests, their family network through a kinship care arrangement. Safeguarding and child protection apply to all children, including those adopted, in kinship care, looked after or in residential care.

- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific 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.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is 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. Appendix 1 defines neglect in more detail.

Making or sharing nudes or semi-nudes includes photographs, videos and livestreams, imagery made by the child or another person, digitally altered imagery and images wholly generated by artificial intelligence, including deepfakes. All such incidents require a safeguarding response, including those described as consensual.

Children includes everyone under the age of 18.

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

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

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

We recognise, challenge and address racism, faith-based prejudice and other discrimination as safeguarding concerns. Staff use professional curiosity, consider the child's lived experience and do not minimise concerns because of disability, family circumstances, ethnicity or culture. Qualified interpreters and accessible communication are used where needed; children are not used to interpret sensitive safeguarding discussions. Poverty, language difference or a diagnosis alone is not evidence of neglect or abuse.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- A planned, inclusive programme of Relationships Education, Health Education and PSHE, delivered regularly and adapted to primary pupils' ages, developmental stages and SEND. The following safeguarding themes are taught through suitable content and language, with additional targeted support where needed:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- Recognising unsafe relationships and unwanted touch, seeking help from trusted adults, and understanding that abuse, grooming, exploitation, coercion, domestic abuse, forced marriage and FGM are

unacceptable. Content is selected and sequenced in accordance with current primary RSHE guidance and the school's curriculum policy.

- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

› Read and understand KCSIE 2026 Part one in full, and review it at least annually. The school also requires staff to read Annex A (Further information). The former condensed Part one has been withdrawn; the overview is supplementary and does not replace full Part one. DSLs and deputies will read and understand the full guidance, including Annex B on their role.

› Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance

› Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)

› Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

› Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies and the behaviour policy, online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education.

› The universal services/community-based early help and Family Help arrangements in section 7.4, including local assessment protocols, referral thresholds, the school's role and review/escalation responsibilities.

› The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

› What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

› The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

› New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm

› The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

› The fact that children can be at risk of harm inside and outside of their home, at school and online

› The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children

› That a child and their family may be experiencing multiple needs at the same time

› What to look for to identify children who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Debbie Norton -Headteacher the DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

When the DSL is absent, the deputies Mrs Louise Gleeson & Mrs Kuldip Kahlon will act as cover.

The headteacher will maintain a written DSL cover rota for both sites and agree named trained DSL/deputy cover for school-run out-of-hours and holiday activities. Staff must know the duty contact before each activity starts. If no DSL/deputy can be reached, staff must take immediate protective action, contact children's social care or police as appropriate, and notify senior leadership; they must not wait for a DSL to return. The local cover rota and contact arrangements must be confirmed before adoption.

Safeguarding communications, including Operation Encompass notifications, will have secure shared access arrangements for the DSL and authorised trained deputies so that absence does not prevent action. The DSL will arrange handover of current risks, outstanding referrals and deadlines. The precise mailbox or equivalent secure process must be recorded in the local implementation checklist; routine email is not an emergency reporting route.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Our DSL is our Prevent lead: She makes sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

› Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation

› Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

› Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

› Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

› Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

› Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

› Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 16 of this policy sets out governor training. The board will review anonymised evidence of implementation, including DSL cover, referral escalation, child-on-child harm, vulnerable pupils, recruitment checks, restrictive interventions and filtering and monitoring. Individual case material is restricted to those with a legitimate need to know.

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

› Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

› Communicating this policy to parents/carers when their child joins the school and via the school website

› Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

› Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

› Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

› Ensuring the relevant staffing ratios are met, where applicable

› Overseeing the safe use of technology, mobile phones and cameras in the setting

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g., DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

The DSL and designated teacher will work with the Virtual School Head as appropriate to improve attendance, attainment and access to support for looked-after and previously looked-after children, children with a social worker, and children in kinship care. Eligibility for specific funding and services will be checked rather than assumed.

6. Confidentiality

You should note that:

› Timely information sharing is essential to effective safeguarding

› Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

› The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

› If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

› Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

› If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: 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
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

› Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

› The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

› If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

› Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

6.1 Sharing information safely and acting on gaps

The DSL will identify what information is necessary to protect the child, who needs it, the appropriate lawful basis and any risks from sharing or withholding it. Consent is not required where another lawful basis permits safeguarding sharing. Information must be relevant, proportionate, accurate, timely and secure; lack of consent or uncertainty about data protection must not delay action needed to protect a child. Advice from the data protection officer may assist but is not a prerequisite for urgent action.

Record what was shared, with whom and why, including decisions not to share and the reasons. Verify recipients, use approved secure methods and distinguish fact, allegation and professional judgement. Where another agency cannot share all information, ask for sufficient safeguarding advice to protect the child and record any limitations. Review risks when a child or parent asks that information be withheld, and follow local escalation arrangements if essential information is unavailable.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviourur, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- 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 drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
  - *Attendance:* "We follow **Working together to safeguard attendance** (statutory) and treat attendance as a safeguarding matter." GOV.UK
  - *Resources:* "We signpost to **CEOP Education**, **CSA Centre**, **The Children's Society**, and **Lucy Faithfull Foundation – Shore Space**." GOV.UK
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Please follow the link below to the GOV.UK webpage for reporting child abuse to your local council:

Hounslow professional referral information: https://www.hounslow.gov.uk/child-protection/report-concern-child-professional. For a child who has been harmed or is at immediate risk of harm, telephone children's services first on 020 8583 6600, option 2 then option 3 (Monday–Friday, 9am–5pm); out of hours 020 8583 2222. Call 999 for immediate danger.

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

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

› Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

› Not recognise their experiences as harmful

› Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out

should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Universal services, community-based early help and Family Help

Staff identify emerging needs early and discuss them with the DSL. Universal services and community-based early help provide preventative support. Family Help brings together targeted early help and section 17 child-in-need support through coordinated multi-disciplinary assessment and planning. The DSL will use Hounslow's current threshold and assessment protocols and identify the lead practitioner and review

arrangements. A non-social-worker lead practitioner will undertake only assessments authorised under local protocols, with appropriate competence, training and social work oversight where required.

The school will contribute its observations, the child's wishes and feelings, attendance and relevant family context. Staff will work with families, explaining help and information sharing, but parental refusal or disagreement does not prevent a necessary child protection referral. Staff will not conduct a social care investigation or postpone protection while seeking a voluntary service.

The DSL will monitor whether support improves the child's safety and wellbeing, keep clear review dates and escalate where needs or risk increase. Concern about significant harm requires immediate referral to children's social care and/or police; Family Help is not a substitute for section 47 enquiries or urgent protection.

Use Hounslow's professional referral page and current online referral route: https://www.hounslow.gov.uk/child-protection/report-concern-child-professional. For urgent harm concerns telephone first using the contacts above, then submit the required written information.

Provide the child's words, observations, chronology, risks to siblings and other children, prior referrals, protective factors and actions already taken. Record the referral, advice, agreed next steps and person responsible on CPOMS. Confirm local Family Help terminology and operational arrangements with Hounslow before adoption.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The referral route and urgent telephone contacts are set out above and in Important contacts. A referral is not complete merely because a form has been submitted: the DSL will seek acknowledgement and follow up the outcome.

If the response does not address the risk, the DSL will use Hounslow safeguarding partnership professional disagreement/escalation procedures, record the escalation and continue school safety measures. New evidence or continuing risk may require a further referral. Previous parental denial, an earlier decision to offer support only, or an unsubstantiated investigation does not remove the duty to act on current concerns.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Please see Department for Education guidance on mental health and behaviour in schools for more information.

Figure 1: current safeguarding action route

Immediate danger/significant harm → call 999 and/or children's social care immediately → alert DSL → record and follow up. Other concern → speak to DSL promptly → assess school/community support, Family Help or statutory referral → record decisions and agreed reviews → check outcomes and escalate if risk continues. If DSL is unavailable, take necessary action directly and inform them as soon as possible.

Staff do not diagnose mental health conditions. They will notice changes, seek the child's views, and use appropriate specialist support. Suicidal statements, self-harm or an immediate threat to life require urgent medical/emergency action alongside safeguarding referrals. Mental health support and child protection may be needed together; one does not replace the other.

7.7 Concerns about staff, supply or trainee teachers, volunteers or contractors

If you have concerns about a member of staff (including a supply or trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply or trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply or trainee teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse, including harassment and violence, is a safeguarding concern for both the child harmed and the child displaying the behaviour. Staff must consider safeguarding alongside the behaviour policy and must not wait for a pattern, a direct disclosure or proof of a criminal offence. Serious physical harm, threats involving weapons, coercion and sexualised behaviour require prompt DSL assessment. The child's chronological age, development, communication and SEND are relevant to support and risk assessment, and must never be used to dismiss harm.

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it

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

› The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

› Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

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

› Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

› Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

› Ensure staff reassure victims that they are being taken seriously

› Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

› Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

› Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

› Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.8.1 Harmful sexual behaviour and immediate protection

Sexual behaviours occur on a continuum from developmentally typical behaviour to problematic or harmful sexual behaviour, sexual harassment and sexual violence. Staff will report behaviour that is intrusive, coercive, persistent, distressing or developmentally inappropriate, including exposing genitals, sexualised touching, sexual threats or recreating adult sexual content. The DSL will use developmentally appropriate specialist advice and consider whether the child displaying the behaviour may also be experiencing abuse, neglect, exploitation or harmful exposure online.

Respond immediately: protect and listen to the child harmed; stop contact safely; alert the DSL without delay; record the child's exact words and observable facts; obtain necessary medical help; and preserve potential evidence without investigating. Do not arrange mediation or force an apology as the safeguarding response.

The DSL will assess immediate and ongoing risk for every child affected, including witnesses and siblings, and record supervision, separation where needed, toileting/changing arrangements, classroom access, transport, breaktimes and online contact. Allocate trusted adults, review after each relevant incident and agree specialist support. Safety arrangements must address the child harmed without placing the burden of avoiding abuse on them.

The DSL will decide and record whether the response requires school support, community-based early help, Family Help, children's social care and/or police. Reports of rape, assault by penetration or sexual assault should be referred to police, including where the child alleged to have caused harm is below the age of criminal responsibility. Children under 13 cannot legally consent to sexual activity. Chronological age alone does not determine a safe response.

Safeguarding referrals and support continue alongside proportionate behaviour decisions, reasonable adjustments and agency investigations. Decisions must not prejudice police enquiries. Persistent or escalating harmful sexual behaviour requires specialist assessment and renewed referral/escalation; suspension or permanent exclusion does not remove the school's safeguarding responsibilities.

7.9 Making or sharing nudes or semi-nudes, including AI-generated imagery

Your responsibilities when responding to an incident

If you become aware of making or sharing nudes or semi-nudes, including altered or AI-generated imagery, report to the DSL immediately. All incidents require a safeguarding response, whether described as

consensual or non-consensual. Follow the controls below; staff must not view, download, forward or copy imagery to establish what happened.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- 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. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through local neighbourhood police, dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Staff record concerns on CPOMS and alert the DSL directly without delay. Children do not need a CPOMS account or written report: they may speak to any trusted adult, use an accessible communication aid or ask another person to help report. The adult takes responsibility for recording and acting.

https://wellington.cpoms.net

We make pupils aware of the reporting systems and processes, e.g., through discussion in your relationships/sex education curriculum and at the time of referral. Reassurances are provided following disclosures.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- The school will assess filtering and monitoring against current DfE standards and use Plan technology for your school where helpful. Safeguarding responsibilities remain with the school even where technical services are outsourced.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Our preventative curriculum addresses online manipulation, misinformation, disinformation, conspiracy theories, misogyny, bullying and exploitation in age-appropriate ways.

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Contact – harmful online interaction with people or systems, including coercion, grooming, exploitation, scams and inappropriate interaction through AI services or chatbots.

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

› Commerce – risks from gambling, inappropriate advertising, phishing, scams and financial exploitation, including monetised online activity and pressure to spend.

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

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

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

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

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

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

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

› Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

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

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

› Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

› Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

8.1 Artificial intelligence (AI)

Generative AI tools and chatbots are increasingly accessible to staff, pupils and families. Their educational use must be assessed against safeguarding, information security, privacy, age restrictions and the DfE's current product safety expectations.

Wellington recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g., bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

8.2 Filtering and monitoring assurance

The governing board will ensure a review of effectiveness at least once every academic year. The responsible SLT member, supported by the DSL and IT support/provider, will check filtering on all internet-connected devices and in all relevant locations across both sites, the Ark and extended provision, and keep a written record of checks, weaknesses, actions, owners and completion dates. Monitoring alerts must have named reviewers and urgent escalation routes; staff must report bypasses, failures and concerning use immediately.

Reviews will take account of ages, SEND, language and communication needs, safeguarding incidents, remote access and new technology. Changes to systems or significant incidents trigger an additional review where necessary. Filtering must block harmful material without unreasonably limiting teaching and learning. Governors receive evidence of completed testing and remedial action, not simply assurance that software is installed.

8.3 Mobile phones, AI and safe communication

Wellington will operate a mobile phone-free school day for pupils, including lessons, breaks and lunchtime, with individually agreed exceptions where justified, including reasonable adjustments or medical needs. The mobile phone policy will set out secure storage, collection, staff responsibilities and how exceptions are authorised. Staff do not use personal devices to photograph or record pupils or communicate privately with them.

Before approving an AI tool, the school will assess child safety features, suitability for the age group, filtering and monitoring coverage, data handling and supervision. Identifiable pupil information, CPOMS records, disclosures or child protection files must not be entered into public or unapproved AI services. AI output is checked by a competent adult and must not replace safeguarding judgement or referral decisions. AI-generated sexual imagery, impersonation, bullying and grooming are responded to under this policy.

Parents will receive accessible guidance about online risks, adult content, games, screen use and how to report concerns. The school will consider the safeguarding significance of severe sleep disruption, distress, compulsive device use or sexualised re-enactment without assuming that device use alone proves abuse.

9. Notifying parents or carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

› Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

› Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

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

› Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

› The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

› Communication barriers and difficulties in managing or reporting these challenges

› Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

Individualised support plans tailored to the child's needs, ensuring staff are trained in recognising and addressing vulnerabilities specific to SEND pupils.

We establish a strong communication network between parents, staff and external agencies, providing consistent emotional and social support.

Safe spaces, trusted adults, and regular check-ins can help these children feel more secure, while tailored safeguarding policies ensure their protection is both proactive and sensitive to their specific challenges.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

10.1 Accessible safeguarding and medical conditions

Children who depend on adults for care, receive intimate care or have limited communication may face additional barriers to recognising and reporting abuse. Staff will use suitable communication aids, trusted adults, planned check-ins and individual intimate care arrangements, while respecting dignity and privacy. A lack of disclosure or outward distress does not mean there is no harm. The Ark applies the same referral thresholds and reporting duties as the rest of the school.

The DSL and SENDCO will review behavioural changes, injuries, withdrawal, unusual fatigue, unexplained absence and sexualised behaviour as possible safeguarding indicators rather than attributing them automatically to ASD, SEND or a medical condition. Record observations objectively and seek appropriate specialist and agency advice.

A medical incident or allergy-management error is not automatically a child protection referral. Staff must provide immediate clinical/first-aid support and follow medical procedures. The DSL will assess safeguarding where the incident suggests neglect, abuse or exploitation, including repeated absence of essential medication or withholding necessary information. Relevant referrals, reasonable adjustments and individual healthcare plans will be coordinated.

10.2 Young carers

Staff will identify children who provide care for family members, including emotional support and care related to disability, illness, mental health or substance misuse. The DSL will consider impact on sleep, attendance, learning, isolation and wellbeing and seek appropriate young-carer assessment and support through the local authority. The child's wishes and family circumstances will be considered without overlooking unsafe or excessive caring responsibilities.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

› Responding to unauthorised absence or missing education where there are known safeguarding risks

- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- *Vulnerable pupils:* "We work with the **Virtual School Head**, including for **children in kinship care**, to promote educational achievement." GOV.UK

We have appointed a designated teacher, Debbie Norton Headteacher ,who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13. Pupils who are lesbian, gay, bisexual or gender questioning

Children who are lesbian, gay or bisexual, or perceived to be so, may face discriminatory bullying; their identity is not itself a safeguarding risk. Wellington provides trusted adults, responds to prejudice promptly and supports every child's safety and wellbeing.

For a child questioning their gender, staff will listen respectfully, avoid assumptions or gender stereotypes, and refer wellbeing or safeguarding concerns to the DSL. The school will not initiate social transition. Staff must not make changes to facilitate social transition without an authorised school decision following KCSIE 2026 paragraphs 254–284.

A request for support with social transition is considered carefully by the headteacher and DSL, with recorded assessment of the child's best interests, wider needs, impact on other children, equality and human rights duties, parental views and any clinical or other professional advice. Parents/carers are engaged as a priority. If their involvement would pose greater risk than non-involvement, the DSL determines protective action before contact or decisions. If a child only discusses feelings and does not request changes, ordinary confidentiality and safeguarding procedures apply; there is no automatic requirement to disclose that conversation without a related safeguarding risk.

Primary-aged children require particular caution. Supporting any degree of social transition should be very rare in primary school and should depend on appropriate clinical advice, as set out in KCSIE 2026. Staff cannot provide clinical assessment. Decisions keep options flexible, are reviewed regularly and are reconsidered if risks emerge or the child wishes to reverse a previous request. The DSL is involved where a child has fully socially transitioned from an early age and their biological sex may be unknown to peers or staff.

Pupils will not use toilets, changing rooms or residential accommodation designated for the opposite biological sex. Where single-sex sport is necessary for safety there are no exceptions. Any other request is considered under safeguarding, equality and human rights duties, with reasons documented. Suitable privacy arrangements are considered consistently with premises requirements. Bullying and harassment remain unacceptable.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Other complaints

We follow a clear procedure to ensure the safety and well being of all. The designated safeguarding lead (DSL) or deputy will promptly assess the complaint, ensuring it is recorded in detail. An investigation is conducted, which may involve inspecting the premises or speaking with staff, pupils and any relevant witnesses. If necessary, external agencies such as social care or the local authority are informed. The school ensures that any identified risks are mitigated immediately, and appropriate action is taken, including repairing hazards or enhancing supervision. Throughout the process, the school maintains confidentially and regularly communicates with the complainant, ensuring transparency and a swift resolution.

14.3 Whistle-blowing

Please refer to our Whistle blowing policy which follows the agreed Hounslow model. This is also in our staff handbook which is reviewed annually with all staff.

All staff should first raise their concern with the school's headteacher or designated whistleblowing officer, providing detailed information about the issue. If the concern involves senior leadership or if staff feel uncomfortable reporting internally, they should escalate the matter directly to the local authority's designated officer. The policy ensures confidentiality and protection from retaliation, and concerns are investigated promptly and thoroughly. Staff should also document their actions and may seek advice from their trade union or a legal advisor if needed.

14.4 Alternative provision and children absent from education

Where Wellington commissions alternative provision, the school retains responsibility for safeguarding the pupil. It will check the provider, obtain written confirmation of recruitment checks, assess suitability for the pupil and agree safeguarding contacts, attendance reporting, transport, information sharing and escalation. The school must know each actual delivery address, including subcontracted or satellite sites.

Placements are reviewed at least half termly for attendance, safety and whether they meet the pupil's needs. A safeguarding concern triggers immediate review and, where necessary, termination unless or until it has been satisfactorily addressed. Being on a local authority approved-provider list does not replace Wellington's own due diligence.

Attendance staff and the DSL will consider safeguarding risk when a child is missing, repeatedly absent, severely absent or not receiving full-time education. Unexplained absence is followed up promptly on the first day with escalation according to individual risk. Work with families, social workers, the local authority and the Virtual School Head as relevant. Part-time timetables are exceptional, temporary and reviewed; they must not be used to manage behaviour through informal exclusion.

A stated intention to home educate triggers liaison with the local authority and relevant agencies, especially where the child has SEND, a social worker or safeguarding concerns. Admission-register deletion must meet the legal grounds in the current attendance regulations; the school will not remove a child merely because of absence or a proposed move.

14.5 Domestic abuse, exploitation and housing instability

Children who see, hear or experience the effects of domestic abuse are victims in their own right. Staff recognise physical, sexual and emotional abuse, coercive control, stalking, financial exploitation and child-to-parent/caregiver abuse. Concerns may overlap with neglect or exploitation and must be referred to the DSL.

Operation Encompass notifications are securely received and reviewed by the DSL or trained deputy, recorded on CPOMS and used to plan timely support and risk assessment. Absence of a notification does not show absence of risk. A notification does not replace a referral; the DSL will liaise with police/social care where thresholds are met. Cover arrangements will ensure notifications are acted on during DSL absence.

Staff remain alert to exploitation by individuals, organised networks or gangs, modern slavery and trafficking, including where a child identifies with a group, appears to agree or has committed an offence under coercion. The DSL will seek children's social care/police advice and an appropriate authorised first responder for National Referral Mechanism consideration. Staff will not criminalise the child or assume only strangers pose risk; most sexual abuse is perpetrated by someone known to the child.

Housing instability or temporary accommodation may disrupt safety, attendance and contact with services. The school will work with Hounslow and receiving authorities, request relevant information under local arrangements and support continuity. The temporary-accommodation notification duty described in KCSIE is a local authority duty; the school acts on relevant information and shares concerns, rather than assuming that duty rests on teachers.

14.6 Restrictive interventions and reasonable force

Prevention, positive behaviour support, reasonable adjustments and de-escalation are prioritised. Where force is lawful and necessary, staff use no more force than necessary for the shortest necessary time, never as punishment. Individual risk and support plans take account of SEND, communication, medical needs and the child's views. This section is read with the behaviour and restrictive intervention procedures and DfE guidance effective from 1 April 2026.

The governing board will ensure procedures record every significant use-of-force incident and every use of seclusion or restraint, including non-force restraint. Staff record incidents in writing as soon as practicable and endeavour to do so the same day, identifying those involved, time, place, duration, SEND/medical needs, events leading up to the incident, de-escalation attempted, necessity, type and degree of intervention, injuries and follow-up support.

Parents receive written information as soon as practicable, with the same-day endeavour. As a maintained school, Wellington supplies a copy of the written seclusion/restraint record to parents. Where informing a parent would be likely to result in serious harm, follow the statutory exception: report to any parent who can safely be told or, if none, to the local authority where the child ordinarily resides. Record the reason and consult the DSL. Parent agreement in a support plan does not remove recording/reporting duties.

Leaders review incidents, obtain medical support where necessary, hear the child's and staff accounts, support witnesses and amend plans to reduce recurrence. Any concern about staff conduct is considered under Appendix 3 and referred to the LADO as appropriate. Governors monitor anonymised frequency, patterns, pupil groups, injuries and completion of required reporting.

14.7 Early years safeguarding and welfare

Nursery and Reception follow the September 2026 EYFS framework alongside KCSIE. Staff and volunteers cannot begin work in EYFS provision until the required enhanced DBS certificate including barred-list information has been received. Supervision is not a substitute. The school checks ongoing suitability, obtains appropriate references and tells staff what information affecting suitability they must disclose.

Safeguarding training and refresher arrangements meet EYFS Section 3 and Annex C; staff receive appropriate supervision, and safeguarding responsibilities are clear during absence and across extended provision. Children's absence and emergency contact information are followed up in line with the EYFS and individual risk.

The EYFS lead will ensure safe sleeping arrangements and checks where children sleep, safe eating, allergy and first-aid arrangements, intimate hygiene and suitable premises. The school has regard to the DfE screen use guidance for early years settings and prioritises purposeful, adult-supported use which does not displace play, interaction and physical activity. Banned dog breeds must not be kept or present where the EYFS prohibition applies; animal visits are separately risk assessed.

For any Ofsted-registered early years or childcare provision, the responsible registered provider must notify Ofsted of allegations of harm or abuse by a person living, working or caring for children at the premises, and the action taken, as soon as reasonably practicable and within 14 days. This applies to harm alleged on or off premises. The school will establish the registration status and responsible provider for each provision; the registered-provider notification duty must not be confused with the separate duties to refer to LADO, police or social care.

14.8 Premises, sport and external providers

Leaders will ensure premises, toilets, changing facilities, PE and residential visits meet applicable safeguarding and school premises requirements. Separate toilets for boys and girls aged eight and over are required, except for permitted single-occupancy facilities with a lockable door intended for one pupil at a time. The existing mixed cubicle arrangement will be checked against these requirements before adoption. Privacy, access and supervision risk assessments consider SEND and intimate care.

PE and sport will be safe and fair, informed by relevant governing-body advice. Where single-sex grouping is necessary for safety, participation follows biological sex without exceptions. Other participation requests are considered with the child's best interests and applicable equality duties. Residential accommodation and changing arrangements are assessed before visits.

External clubs and childcare providers must supply safeguarding assurances, identify a safeguarding contact, agree information-sharing and allegation routes and meet requirements appropriate to their provision, including EYFS/registration requirements where applicable. The school will inspect assurance evidence as necessary. These duties apply even where attending children are not on Wellington's roll. Lease/hire agreements make safeguarding a condition of use and provide for termination on non-compliance.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded on CPOMS and logged. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

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

Safeguarding records are retained securely in accordance with the school's approved retention schedule, applicable data protection requirements and any legal hold. The schedule must specify the child protection retention period; records are not deleted simply because a child leaves or an issue appears resolved.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

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

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

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

The file transferred will include a clear structured summary of current risks, relevant historical context, ongoing support, agency contacts and required immediate actions. Historic concerns will be distinguished from current risks. Secure transit and receipt will be confirmed, and the receiving school will be asked to ensure appropriately trained staff review the information and put support in place. Relevant information may need to be shared before the child starts. The DSL will record the handover and follow up any missing confirmation.

In addition:

› Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

› Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

› Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

› Be in line with advice from the 3 safeguarding partners

› Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

› Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

› Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured those safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

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

17. Monitoring arrangements

This policy will be reviewed **annually** by our DSL Debbie Norton Headteacher. At every review, it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle blowing
- IT Acceptable Use

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Emotional abuse includes verbal abuse such as persistent criticism, belittling and name-calling. Abuse, neglect and exploitation may occur together and inside or outside the home, including online; staff assess the whole pattern of concerns.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including penetrative and non-penetrative sexual acts, oral sex, masturbation, kissing, rubbing, and sexual touching inside or outside clothing. Rape and assault by penetration have distinct legal definitions; rape involves intentional penile penetration of the vagina, anus or mouth without consent, while assault by penetration involves intentional sexual penetration of the vagina or anus by a body part or object without consent. Sexual assault is intentional sexual touching without consent and without reasonable belief in consent.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

Neglect is 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 care-givers)
- Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

› Our school's commitment to safeguarding and promoting the welfare of children

› That safeguarding checks will be undertaken

› The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

› Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

› Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

› Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

› Consider any inconsistencies and look for gaps in employment and reasons given for them

› Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

› Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

› Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

› Not accept open references

› Liaise directly with referees and verify any information contained within references with the referees

› Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations

› Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

› Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

› Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

› Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

› Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

› Explore any potential areas of concern to determine the candidate's suitability to work with children

› Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

› Verify their identity

› Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

› Outside EYFS provision, any exceptional start before the DBS certificate is available requires all other checks, including a separate children's barred-list check, an individual recorded risk assessment and appropriate supervision. In EYFS provision, staff and volunteers must not start until the required enhanced DBS certificate including barred-list information is received.

› Verify their mental and physical fitness to carry out their work responsibilities

› Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

› Verify their professional qualifications, as appropriate

› Ensure they are not subject to a prohibition order if they are employed to be a teacher

› Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: criminal records check for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity is assessed against KCSIE 2026 paragraphs 317–320 and Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended. It includes:

- Paid or unpaid teaching, training, instructing, caring for or supervising children, advice/guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, where undertaken frequently (more than 3 days in any 30-day period) or qualifying overnight activity;
- Other paid work in a specified establishment such as a school, with opportunity for contact with children, when the frequency condition is met. Supervision no longer exempts regular volunteers doing the relevant activities from regulated activity;
- Relevant personal care or healthcare, which is regulated activity regardless of frequency. Eligibility must be established before requesting barred-list information; it must not be requested where the person is not engaging in or seeking regulated activity. The full statutory definition governs edge cases.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Required DBS referrals also apply to volunteers and to those who leave before they would have been removed from regulated activity. Ending a placement or allowing resignation does not avoid the referral duty.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

As Wellington is a maintained school, the academy-only Secretary of State countersignature requirement for an academy chair does not apply.

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Volunteer and placement checks must be decided by the actual activity, frequency and EYFS rules, not a label such as “helper”, “shadowing” or “supervised”. Regular volunteers in regulated activity require an enhanced DBS check including children’s barred-list information even if supervised. Occasional volunteers outside regulated activity are risk assessed; barred-list information is not requested without eligibility.

Work experience and visiting pupils: a pupil undertaking genuine work experience is assessed under the specific KCSIE 2026 work experience provisions. A DBS check is not available for a child under 16. For 16- or 17-year-olds the school will assess the actual duties, frequency, opportunity for contact and whether the role constitutes regulated activity, rather than assume every placement needs, or is exempt from, DBS checks. Record written supervision and boundaries; students must not be left in charge of a class or assigned unchecked intimate care. Follow the stricter EYFS certificate-before-start requirement wherever applicable.

Teacher qualification/prohibition checks will use DfE's Check a teacher's record service where appropriate. DBS Update Service status checks require consent and confirmation that the certificate is appropriate to the role and workforce; joining the service must be within the applicable registration window (including within 30 calendar days of certificate issue). Self-employed contractors must supply an appropriate eligible check or the school will arrange one through an authorised route.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply or trainee teacher, volunteer or contractor, 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 indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

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

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

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

Based on an assessment of risk, we will consider alternatives such as:

- 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 the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority. If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

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

Procedure for dealing with allegations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

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

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

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

Trainee teachers and third-party staff

The school and training provider/agency share safeguarding responsibilities. Concerns about salaried or fee-funded trainees follow the same reporting and LADO threshold procedures as other staff. The headteacher will liaise with the training provider/employer and LADO, agree immediate protection, evidence sharing and investigation responsibilities, and consider DBS/TRA referrals where required. Ending a placement alone is not an adequate response.

Timescales

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

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

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

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

Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

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

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

References

When providing employer references, we will:

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

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school’s safeguarding system

Responding to low-level concerns

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

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school’s staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

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

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

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account

- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an

exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

› Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

› Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

› Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

› Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

› Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

› 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

› Making or sharing nudes or semi-nudes, including consensual and non-consensual sharing, digitally altered images and AI-generated imagery; all require a safeguarding response.

› Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

› Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate local safeguarding procedures and refer to children's social care and police as appropriate. The LADO route concerns allegations about adults working with children and is not the standard route for a forced-marriage concern about family members. Do not contact family or community members where this may increase risk.
- Seek current Forced Marriage Unit advice via https://www.gov.uk/stop-forced-marriage and follow the agency safety plan. Do not mediate with family or community members.
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

› **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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

› Refusal to engage with, or becoming abusive to, peers who are different from themselves

› Becoming susceptible to conspiracy theories and feelings of persecution

› Changes in friendship groups and appearance

› Rejecting activities, they used to enjoy

› A change in religion or lawful political views, by itself, is not evidence of radicalisation. Consider behaviour, context and evidence of risk of involvement in terrorism without stereotyping.

› Isolating themselves from family and friends

› Talking as if from a scripted speech

› An unwillingness or inability to discuss their views

› A sudden disrespectful attitude towards others

› Increased levels of anger

› Increased secretiveness, especially around internet use

› Expressions of sympathy for extremist ideologies and groups, or justification of their actions

› Accessing extremist material online, including on Facebook or Twitter

› Possessing extremist literature

› Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our curriculum policy, behaviour policy and online/e-safety policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment 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.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

Visitors will sign in, verify identity where appropriate, receive safeguarding information and wear identification. Staff assess purpose, access and supervision. Personal devices must not be used to photograph children; local device rules are explained at arrival.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign into the visitors' portal and wear a visitor's badge.

For professional visitors, check photo ID and obtain assurance of appropriate DBS checks for their activity. Employer confirmation is sufficient; do not request to see the certificate where the employer has confirmed appropriate checks. A visitor with no child contact is unlikely to need a DBS check.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Family members or other visitors attending school events such as sports day are not routinely asked for DBS or barred-list checks or existing certificates. Escort/supervision is determined by risk. External organisations and speakers are assessed for suitability, educational value and age-appropriateness. Volunteers, contractors and work-experience students follow the role-specific arrangements in Appendix 2.

Non-collection of children

If a child is not collected at the end of the session/day, we will follow the procedure below:

1. Immediate response: keep the child safely supervised and begin contacting parents/carers and authorised emergency contacts promptly after the expected collection time. Do not wait where there is a known safeguarding risk.

2. Inform senior leadership/DSL promptly, assess the child's circumstances and continue contact attempts. Release the child only to an authorised adult whose identity is verified.

3. Supervise the Pupil: Ensure the child is supervised at all times by a staff member in a safe and comfortable environment, avoiding any feelings of anxiety.

4. Senior oversight: the DSL/senior leader coordinates safe collection, agency advice and handover. The child must remain supervised until an authorised safe arrangement is confirmed.

5. Further action: seek children's social care/out-of-hours advice if safe collection cannot be arranged, or immediately where the circumstances suggest neglect or danger. Call 999 where there is immediate risk. Do not use a fixed waiting period to delay a necessary safeguarding response.

6. Documentation: Record the incident in the school's CPOMS log, noting all actions taken, times, and communication attempts.

Throughout the process, the child's well-being is prioritized, and staff should reassure the pupil until they are safely collected

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Procedure for a Missing Child Before or After the School Day:

1. Immediate Search: As soon as a child is reported missing, staff should immediately search the school premises, including playgrounds, classrooms, and common areas. Alert all available staff to assist in the search, checking high-risk areas such as gates or exits.

2. Secure the Site: If the child is not found quickly, ensure that all entrances and exits are secured to prevent further risk. Designate staff members to monitor these points while continuing the search.

3. Check Attendance and club attendance: Confirm the child's attendance for the day or any after-school activity schedules. Verify if the child was collected early or had been given permission to leave with someone else.

4. Contact Parents/Guardians: If the child is still missing, immediately contact the child's parents or guardians to inform them and verify whether the child has gone home or been collected. Check emergency contact details if needed.

5. Inform Senior Leadership: Alert the headteacher or a senior leadership team (SLT) member about the situation. The DSL should also be informed in case safeguarding concerns arise.

6. Notify authorities immediately according to risk. Call 999 without delay if a child is missing and at immediate risk, including a vulnerable child believed to have left the site near traffic, the railway or other hazards. Contact police promptly when the child cannot be located and safety cannot be established. There is no 20-minute waiting requirement. Search, senior-leadership/DSL notification and parent contact should run concurrently where possible; do not leave other pupils unsupervised.

7. Support the Child and Parents: Once the child is found, ensure they are safe and provide any necessary emotional support. Parents should be notified immediately, and a debrief with the child should take place to understand the circumstances.

8. Record and Review: Record the incident in the school's safeguarding log, noting all actions taken, times, and outcomes. Conduct a review of procedures and or a risk assessment of adult collection lists and agreements to prevent similar occurrences in the future.

Appendix 5: source register and adoption confirmations

Prepared 6 October 2026. This is a review draft, not a record of governing board adoption or of completed operational checks. Highlighting identifies substantive amended/added wording; it is not Word Track Changes. National guidance wording takes precedence in the event of a summary being unclear.

S1. KCSIE 2026, September 2026; Parts 1–5, Annex A (further information), Annex B (DSL), Annex C (changes).
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

S2. Working Together to Safeguard Children 2026; March 2026 and published summary of changes.
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

S3. EYFS group and school-based framework; effective 1 September 2026; Section 3 and Annex C.
https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

S4. Restrictive interventions, including use of reasonable force, in schools; effective 1 April 2026; recording/reporting duties.
https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

S5. Revised RSHE statutory guidance; effective 1 September 2026.
https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

S6. Working together to improve school attendance; July 2026 edition.
https://www.gov.uk/government/publications/working-together-to-improve-school-attendance

S7. EYFS 2026 changes and linked screen use guidance.
https://help-for-early-years-providers.education.gov.uk/support-for-practitioners/changes-to-the-eyfs-framework

L1. Hounslow professional child concern referral route and urgent contacts.
https://www.hounslow.gov.uk/child-protection/report-concern-child-professional

L2. Hounslow Safeguarding Children Partnership: LADO referral duty contact.
https://www.hscb.org.uk/professionals/allegations-against-professionals/

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Local checks before approval and publication

• Confirm the chair and safeguarding governor, all trained deputy DSL appointments, name spellings and contact details; reconcile the wider deputy list with the cover rota.

• Record named DSL cover on both sites, out-of-hours/holiday contacts and the secure mailbox or equivalent arrangement, including Operation Encompass handover.

• Verify current Hounslow threshold, Family Help assessment/lead practitioner arrangements and professional disagreement escalation contacts; circulate the current local procedures.

• Audit current staff, volunteers, trainees and contractors against revised regulated activity and EYFS checks; record decisions and address any unchecked role before it continues.

• Complete filtering/monitoring checks across both sites and connected devices; name the SLT owner, alert reviewer and IT contact and record remedial actions.

• Align mobile phone, RSHE, behaviour/restrictive intervention, attendance, medical/allergy, intimate care, AI and acceptable-use policies; brief staff on changed procedures.

• Check toilet/changing/residential arrangements against premises requirements, including the existing mixed cubicle; check each external provider's safeguarding and registration status.

• Confirm approved safeguarding retention periods, secure transfer summaries and receipt controls; do not leave retention as an unspecified "reasonable period".

• Record governor approval/adoption dates, publish the adopted policy, obtain full Part one reading declarations and report implementation progress at the next safeguarding review.