



Child Protection and Safeguarding Policy

Caelum House School and Play2Talk Nursery

Blue Sky Autism Project

Reviewed: September 2026 • Approved: September 2026 • Next review: September 2027

KCSIE 2026 • Working Together 2026 • EYFS 2026

Important contacts

Role	Name	Email	Telephone
DSL (School)	Tori Khan	tori@blueskyautism.com	0207 821 1949
DSL (Nursery/Therapy)	Imogen Finkle	imogen@blueskyautism.com	0207 821 1949
Deputy DSL	Dr Ruth Glynne-Owen	ruth@blueskyautism.com	0207 821 1949
Deputy DSL (Nursery - Pimlico)	Sarah Hayward	sarah@blueskyautism.com	0207 821 1949
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1. Aims

In line with our school vision, 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 the current statutory guidance and legal framework applying to Caelum House School and its early years provision in England. It is to be read and implemented alongside:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- The Early Years Foundation Stage (EYFS) statutory framework for group and school-based providers, effective 1 September 2026
- Information sharing advice for safeguarding practitioners (current DfE guidance)
- Prevent duty guidance for England and Wales
- Statutory guidance relating to female genital mutilation (FGM)
- Statutory guidance and local procedures for children missing from education
- The statutory guidance on mobile phones in schools, effective from 1 September 2026
- Relevant local safeguarding partnership procedures and thresholds

This policy also has regard to the following legislation and statutory duties, as applicable:

- Education Act 2002, including section 175
- Children Act 1989 and Children Act 2004
- Education and Inspections Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Childcare Act 2006 and the Early Years Foundation Stage (Welfare Requirements) Regulations 2012
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015

- Counter-Terrorism and Security Act 2015
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Rehabilitation of Offenders Act 1974
- School Staffing (England) Regulations 2009
- Relevant DBS and safer-recruitment requirements
- Dangerous Dogs Act 1991, including the EYFS requirement concerning banned dog breeds on premises

Where statutory guidance is updated, this policy will be interpreted in accordance with the current statutory requirements pending formal review.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- 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
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. 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.

Self-generated intimate images and/or videos are intimate images or videos created by children or young people themselves. This includes images or videos created, altered or generated using artificial intelligence, including deepfakes. Such material must be treated as a safeguarding concern and managed in accordance with KCSIE 2026 and the school's safeguarding procedures. A child is anyone under the age of 18.

Local safeguarding arrangements are made through the relevant safeguarding partners and local safeguarding partnership arrangements. The school will work with the local authority, police, health services and other relevant agencies in accordance with local safeguarding procedures.

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, 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 (SEN) or disabilities or health conditions (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- 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 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 11)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

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 (organised and led by school staff) 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 and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- 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)

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will read and understand Part One in full and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have read and understood the guidance.

All staff will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

All staff will provide a safe environment for pupils who are LGBT to speak out and share any concerns they may have.

All staff will be aware of:

- Our systems which 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, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- 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 and neglect, as well as specific safeguarding issues, such as child-on-child abuse, 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)
- 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, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

Section 14 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

Tori Khan, Deputy Headteacher, is the Designated Safeguarding Lead (DSL) for Caelum House School. Imogen Finkle, Therapy Manager and Consultant, is the DSL for Play2Talk Nursery and the therapy services. Each DSL takes lead responsibility for child protection and wider safeguarding within their provision and is available during working hours for staff to discuss concerns. Tori can be contacted at tori@blueskyautism.com or through the school office on 020 7821 1949. Imogen can be contacted at imogen@blueskyautism.com. Dr Ruth Glynn-Owen and Sarah Hayward are the Deputy DSLs and provide cover when a DSL is unavailable.

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

The DSL will also:

- 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 descriptions.

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

They will 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 leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- 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 children 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 14 of this policy has information on how governors are supported to fulfil their role.

6. Confidentiality

It is important to 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 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 13, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

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 children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or 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:

Westminster - accesstochildrensservices@westminster.gov.uk

Telephone:

020 7641 4000

PLEASE SEE UP TO DATE EMERGENCY CONTACT LIST for all council safeguarding teams kept in the Safeguarding Folder and electronically in our CP dropbox folder.

Child abuse can be reported to the local council <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
- Record concerns onto Expression of Concern form and assign it on to the DSL. Alternatively, if appropriate, make a referral to 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.

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 Female genital mutilation (FGM)

Female genital mutilation (FGM) involves procedures that remove or injure the external female genitalia for non-medical reasons. It is illegal in the UK and is a form of child abuse with long-lasting harmful consequences. It may also be described as "female genital cutting", "circumcision" or "initiation". Possible indicators that FGM has taken place, or that a pupil may be at risk, are set out in **Appendix 4**.

Mandatory reporting duty for teachers

A teacher must **personally report to the police** if, in the course of their work, they discover that FGM appears to have been carried out on a girl under 18. This may be because:

- The girl tells the teacher that FGM has been carried out on her; or
- The teacher observes physical signs that appear to show FGM has taken place.

Staff must not examine a pupil to look for signs of FGM. A teacher who fails to comply with the mandatory reporting duty may face disciplinary sanctions. Unless there is a good reason not to, the teacher should also discuss the case with the DSL or a deputy and involve children's social care as appropriate.

Concerns about risk or suspected FGM

The mandatory duty to report personally to the police does not apply where a pupil is *at risk* of FGM or where FGM is suspected but is not known to have taken place. In those circumstances, staff must speak to the DSL or a deputy promptly and follow local safeguarding procedures.

Any member of staff who is not a teacher and learns that FGM appears to have taken place must also report the concern to the DSL or a deputy promptly. If a child is in immediate danger, staff must take immediate action, including contacting the police or children's social care as appropriate. The absence of the DSL must not delay a necessary referral.

7.4 If you have concerns about a child

If you have concerns about a child's welfare, speak to the DSL or a deputy as soon as possible to agree what action to take. If neither is available, this must not delay action. Seek advice from a member of the senior leadership team or the child's home local authority children's social care. Anyone can make a referral. Tell the DSL or a deputy about any action you take as soon as possible.

You can also seek advice from the NSPCC Helpline on **0808 800 5000**. If a child is in immediate danger, call **999**.

Family Help and early support

If Family Help or early support is appropriate, the DSL will usually liaise with other agencies and coordinate the school's contribution to an assessment and support plan. Staff may be asked to contribute and, where appropriate, act as lead practitioner. The DSL will review the child's progress and consider a referral to children's social care if concerns increase or the support is not meeting the child's needs.

Referrals should follow the procedures of the **child's home local authority**. For children who live in Westminster, the usual referral route is the online Multi-Agency Assessment and Referral Form (MAARF). Current contact details and referral routes for other local authorities are held in the school's safeguarding folder.

Referral to children's social care

If a referral is needed, the DSL will make it or support the member of staff to do so. Any member of staff may make a referral directly when necessary and must inform the DSL or a deputy as soon as possible afterwards. If the child has an allocated social worker, contact that worker. Otherwise, refer to children's social care in the child's home local authority. Follow the relevant local procedure for confirming a telephone referral in writing.

Within one working day, a local authority social worker should acknowledge the referral and decide what response is needed. The person who made the referral and the DSL should follow up if no response is received, record the outcome, and use local escalation procedures if concerns remain or the child's situation does not improve.

Discuss the referral with parents or carers where appropriate, unless doing so would put the child at greater risk, prejudice an investigation or cause harmful delay. Seek advice from the DSL or children's social care if you are unsure. A lack of parental consent must not prevent a necessary child protection referral.

7.5 If you have concerns about extremism or radicalisation

If you are concerned that a child may be vulnerable to radicalisation, speak to the DSL or a deputy promptly. If neither is available, seek advice from a member of the senior leadership team or the child's home local authority children's social care. Do not delay appropriate action. The DSL will assess the concern and consider a referral to the local Prevent team, Channel or children's social care, as appropriate. If you make a referral directly, inform the DSL or a deputy as soon as possible.

For advice about extremism in education settings, contact the Department for Education on **020 7340 7264** or at **counter.extremism@education.gov.uk**. This is not an emergency service.

If someone is in immediate danger or you believe a terrorist incident may be imminent, call **999**. For other information about possible terrorist activity, contact the confidential Anti-Terrorist Hotline on **0800 789 321**.

7.6 If you have a mental health concern

If a pupil's mental health concern is also a safeguarding concern, follow section 7.1 if the child is suffering or likely to suffer harm, or is in immediate danger. For other safeguarding concerns, follow section 7.4. If it is not a safeguarding concern, speak to the DSL to agree how the pupil should be supported.

The school's response should include:

- An assessment of the pupil's needs.
- A plan setting out the support the pupil will receive.
- Action to put that support in place.
- Regular reviews of whether the support is helping, with changes made where needed.

Support can begin while the school is assessing the pupil's needs. The pupil's response to that support can also help identify what they need. Where more specialist support is required, the school may consider a referral to the Children and Young People's Mental Health Service (CYPMHS). Staff should refer to the Department for Education's guidance on mental health and behaviour in schools for further information.

7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head of School as soon as possible.

If the concerns/allegations are about the Head of School, speak to the Chair of Governors. The 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 teacher, volunteer or contractor) to the Head of School, report it directly to the local authority designated officer (LADO). Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

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 behaviour and an unsafe environment for pupils.

We recognise that child-on-child abuse can be gendered. However, all child-on-child abuse is unacceptable and will be taken seriously. Most cases of pupils hurting other pupils will be dealt with under the school’s behaviour policy. This child protection and safeguarding policy will apply to allegations that raise safeguarding concerns, including where the alleged behaviour:

- Is serious or potentially a criminal offence.
- Could put other 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:

- Record the allegation and tell the DSL. Do not investigate it yourself.
- The DSL will contact local authority children’s social care and follow its advice. The DSL will also contact the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan in place for all children involved, including the victim, the child against whom the allegation has been made and any others affected. Each child will have a named person they can speak to if needed. The assessment will consider school transport as a potentially vulnerable setting.
- The DSL will consider a referral to Children and Young People’s Mental Health Services, where appropriate.

If the incident may be a criminal offence and there are delays in the criminal process, the DSL will work with the police and other agencies as required to protect the children involved and consider any disciplinary action. We will ask the police for guidance where an action by the school could affect their investigation.

We will work with other relevant professionals, such as the local authority designated officer (LADO) or a social worker where appropriate, to support the victim, the child against whom the allegation has been made and any other children affected.

Creating a supportive environment and reducing the risk of child-on-child abuse

We will take proactive steps to reduce the risk of child-on-child abuse and create an environment in which pupils feel able to report concerns.

We will:

- Challenge derogatory or sexualised language and inappropriate behaviour between pupils, including requests for or sharing of sexual images.
- Be alert to behaviours that may affect pupils differently, including sexualised or aggressive touching and initiation or hazing behaviour.
- Use the curriculum to teach pupils about appropriate behaviour and consent.
- Make it easy for pupils to report abuse through the reporting systems described in **section 7.9**.
- Reassure pupils who report abuse that they are being taken seriously.
- Look for patterns in reports of sexual violence or harassment that may indicate a problem with the school environment, policies, procedures or curriculum, or a wider local concern to share with safeguarding partners.
- Support children who have witnessed sexual violence and take steps to prevent bullying or harassment of the victim, the child against whom the allegation has been made and any witnesses.
- Consider harm within families and any support needed for siblings following a report of sexual violence or harassment.

Staff will be trained to understand:

- How to recognise signs of child-on-child abuse and respond to reports.
- That an absence of reports does not mean abuse is not happening; staff should maintain an attitude of “it could happen here”.
- Concerns about a child’s welfare require prompt action, even when the child has not made a direct report. For example, a child may show signs of distress, a friend may report a concern, a member of staff may overhear a conversation, or a change in behaviour may indicate that something is wrong.
- That some children may face additional barriers to reporting abuse because of their vulnerability, disability, gender, ethnicity or sexual orientation.
- That a pupil who harms another pupil may also be experiencing abuse and may need support under this policy.
- Their role in preventing child-on-child abuse and responding when they believe a child may be at risk.
- That they should speak to the DSL about any concern.
- That social media may affect an incident or allegation, including through contact between those involved and their friends.

Disciplinary action and other investigations

The DSL will coordinate the safeguarding response and support for the children involved. Any disciplinary action will be considered under the school’s behaviour policy alongside that support.

The school may need to make decisions while a police or other agency investigation is ongoing. Another investigation does not, by itself, prevent the school from reaching its own conclusion or taking proportionate disciplinary action.

Decisions will be made case by case, considering whether:

- The proposed action could prejudice an investigation or prosecution. The school will discuss this with the police or local authority children's social care where needed.
- It would be unreasonable for the school to reach its own conclusion while an independent investigation is ongoing.

7.9 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
- Pupils should report concerns to a trusted adult
- Pupils are made aware of the reporting systems and processes through discussion in our PSHE/ RSE curriculum
- Pupils will feel safe in submitting any concerns and be given reassurances provided following disclosures

7.10 Online safety and the use of mobile technology

We recognise the importance of protecting children from harmful or inappropriate online material. Technology can also play a part in safeguarding and wellbeing concerns.

Our school aims to:

- Have clear processes to support the online safety of pupils, staff, volunteers and governors.
- Teach the school community how to use technology safely and responsibly, including mobile and smart devices.
- Set clear rules for the use of mobile devices.
- Identify, respond to and escalate online safety concerns promptly.

The four categories of online risk

Our approach addresses four categories of risk:

- **Content:** Exposure to illegal, inappropriate or harmful material, including pornography, misinformation, racism, self-harm content and material promoting radicalisation or extremism.
- **Contact:** Harmful interactions with others online, including pressure from peers and adults who may seek to groom or exploit children.
- **Conduct:** Online behaviour that causes or increases the risk of harm, including bullying and the creation or

sharing of intimate images or videos. This includes material generated or altered using artificial intelligence.

● **Commerce:** Risks such as inappropriate advertising, online gambling, phishing and financial scams.

How we support online safety

To address these risks, we will:

- Teach pupils about online safety through the curriculum, in ways that are accessible and appropriate to their needs. This includes safe use of technology, protecting personal information, recognising concerning behaviour and knowing how to report it.
- Train staff on safe internet use and online safeguarding risks during induction, with updates at least annually.
- Share online safety information with parents and carers and explain how they can raise concerns.
- Make staff aware of the rules on personal phones and cameras. Personal phones must not be used in classroom areas or to photograph or record pupils.
- Make the school community aware of our acceptable use rules for school ICT systems, the internet and mobile devices.
- Respond to breaches of these rules in line with the school's relevant policies. Any search or confiscation of a pupil's device will follow the applicable Department for Education guidance and school procedures.
- Maintain appropriate filtering and monitoring on school devices and networks. We will review these arrangements at least annually and when there is a material change in risk.
- Review our wider approach to online safety annually, taking account of the needs and risks within our school community.

Mobile devices and internet access at Caelum House

Pupils are not permitted to bring personal mobile phones or internet-enabled devices into school. They may use school ICT equipment for learning and curriculum activities under staff supervision, but must not have unsupervised access to internet-connected devices.

This section summarises our approach. Staff should refer to the school's **Online Safety Policy** and relevant acceptable use procedures for full details.

7.11 Safeguarding in the early years

Caelum House School provides early years provision and applies the safeguarding and welfare requirements in Section 3 of the EYFS statutory framework for group and school-based providers, effective from 1 September 2026. The school does not maintain a separate EYFS safeguarding policy where this policy already meets those requirements.

Imogen Finkle is the Designated Safeguarding Lead (DSL) for Play2Talk Nursery and the therapy services. Dr Ruth Glynne-Owen and Sarah Hayward are the Deputy DSLs. Every practitioner must be alert to concerns about children, including concerns arising from a child's home or elsewhere.

Our EYFS safeguarding arrangements include:

- Prompt action and referral where there are concerns about a child's safety or welfare.
- Clear procedures for allegations or concerns about staff, volunteers, contractors or other adults.
- Written procedures for safeguarding, whistleblowing, mobile phones, cameras and electronic devices, safer recruitment and safeguarding training.
- A clear route for staff to raise concerns about poor or unsafe practice, including the school's whistleblowing procedure and external routes where concerns are not addressed.
- Appropriate supervision and support for staff, including opportunities to discuss child protection concerns confidentially.
- Safer recruitment and suitability checks for people who work in, or regularly have contact with children in, the early years provision.
- Required enhanced criminal record and barred-list checks for relevant people aged 16 and over, including volunteers, subject to the statutory exception for occasional supervised volunteers.
- Ensuring that no new employee or volunteer begins working in the EYFS provision before the required checks have been received, subject only to the applicable statutory exception.
- Requiring staff and prospective staff to disclose information that may affect their suitability to work with children, subject to the law on protected convictions and cautions.
- Obtaining at least one written reference before recruitment and checking references for authenticity and discrepancies.
- Referring an individual to the Disclosure and Barring Service where required if they are dismissed, or would have been dismissed had they not left, because they harmed a child or put a child at risk of harm.
- Notifying Ofsted of allegations of harm or abuse by anyone living, working or looking after children on the premises, whether the alleged incident occurred on or off the premises. Notification will be made as soon as reasonably practicable and within 14 days, together with information about the action taken.
- Following up child absences promptly and considering patterns, prolonged or unexplained absences, and the child's vulnerability, family circumstances and home life as potential safeguarding indicators.
- Maintaining a written attendance procedure setting out expectations for parents and carers and the action taken when a child is absent without notification or for a prolonged period.
- Following the EYFS safer-sleep requirements where applicable to the children attending.
- Ensuring that banned dog breeds, including XL Bully type dogs within the scope of the Dangerous Dogs Act 1991, are not kept or present on premises used for the EYFS provision.
- Having regard to Department for Education guidance on children's screen use in early years settings.
- Supervising children appropriately, with particular attention to eating, toileting, intimate care, transitions and activities where individual children may be especially vulnerable.
- Balancing children's privacy with their safeguarding and support needs during toileting, changing and intimate care.
- Ensuring that at least one person with a current full paediatric first aid certificate is on the premises and available whenever EYFS children are present, and accompanies children on outings. Certificates will be renewed every three years as required.
- Providing all EYFS practitioners with safeguarding training that meets Annex C of the EYFS framework. Training will be renewed every two years, with additional refresher training where required.
- Providing EYFS staff with induction covering safeguarding, child protection, health and safety, and emergency evacuation procedures.
- Using staff supervision to discuss child protection, development and wellbeing concerns.

- Maintaining relevant EYFS records securely and sharing information appropriately with parents and carers, professionals, children's social care, the police and Ofsted where necessary.

Parents and carers will be informed about the EYFS arrangements, including how safeguarding concerns, attendance, collection, missing-child incidents and complaints are managed.

7.12 Non-collection of children

If a child is not collected at their designated collection time, staff will contact the child's parents or carers and then their emergency contacts. The child will remain supervised while these contacts are attempted. Collection and any late arrival will be recorded through the school office signing-in system.

Regular late collections may require a meeting with a member of the Senior Leadership Team. If no parent, carer or emergency contact can be reached within 30 minutes of the designated collection time, the school will consider contacting children's social care in accordance with its non-collection procedure.

7.13 Missing pupils

Caelum House School takes the safety of children seriously and maintains procedures to prevent children from going missing and to respond immediately if a child cannot be accounted for.

If a child is missing or their whereabouts cannot be accounted for:

- Staff will immediately raise the alarm and follow the school's missing-child procedure.
- Staff will search the premises and immediate safe areas in accordance with the risk assessment, without compromising the supervision of other pupils.
- The DSL or Head of School will be informed immediately.
- Parents or carers will be contacted as appropriate.
- The police will be contacted immediately where there is a risk to the child, the child may have left the premises, or local procedures require police involvement.
- The child's home local authority children's social care will be contacted where safeguarding concerns arise.
- The school will preserve relevant records and evidence.
- The incident will be reviewed, including supervision, staffing, environmental risks and the child's individual risk assessment.
- Any concern about staff conduct will be managed separately through the allegations or low-level concerns procedure, as appropriate. Suspension will not be automatic and will be considered in accordance with KCSIE 2026, local procedures and the facts of the case.

For EYFS children, parents and carers will be provided with the school's arrangements for children going missing. The school will follow the EYFS safeguarding and welfare requirements.

7.14 Pupils absent from education

A child's absence can be a warning sign of safeguarding concerns, including neglect, exploitation and other forms of harm. Attendance concerns must therefore be considered alongside the child's individual circumstances.

Caelum House School and Play2Talk Nursery maintain attendance monitoring systems. Staff must report unexplained, unusual, prolonged or repeated absence to the DSL without delay.

For EYFS children, the school will follow up absences promptly, contact parents or carers and alternative emergency contacts where appropriate, and consider patterns and trends alongside the child's vulnerability, family circumstances and home life. Concerns will be referred to children's social care or the police where appropriate.

For school-age pupils, attendance concerns will be managed in accordance with the school's attendance policy and current Department for Education attendance guidance, with safeguarding escalation where required.

7.15 Safeguarding training

All staff working in the school will receive safeguarding and child protection training at induction and regular updates at least annually, with additional training where their role, circumstances or identified risks require it. All staff must read KCSIE 2026 Part One in full and follow this policy.

EYFS practitioners will receive safeguarding training that meets Annex C of the EYFS framework. This training will be renewed every two years, with additional refresher training where needed.

The DSL and Deputy DSLs will undertake appropriate safeguarding training at least every two years and update their knowledge and skills regularly, at least annually.

Trustees and governors will receive safeguarding training at induction and regular updates. At least one person involved in each staff recruitment process will have completed safer recruitment training.

8. Notifying parents

Where appropriate, we will discuss concerns about a child with their parents or carers. The DSL will normally do this following a suspicion or disclosure, but may first seek advice from children's social care. Other staff will speak to parents or carers about safeguarding concerns only after consulting the DSL.

If we believe that informing parents or carers could increase the risk to the child, we will discuss this with children's social care before contacting them.

Where an allegation of abuse involves another child, we will normally inform the parents or carers of the children involved. We will consider carefully what information can be shared about another child and when it should be shared. We will work with the police or children's social care to ensure that our approach is appropriate.

The DSL, together with relevant agencies where appropriate, will:

- Meet with the child who has reported abuse and their parents or carers to explain the safeguarding measures being put in place, understand their wishes and discuss the support they need.
- Meet with the parents or carers of the child against whom the allegation has been made to discuss support and any measures that will affect their child, including the reasons for those measures.

9. Pupils with special educational needs, disabilities or health conditions

We recognise that pupils with special educational needs and disabilities (SEND), or certain health conditions, can face additional safeguarding challenges. Barriers to recognising or reporting abuse and neglect may include:

- Assuming that signs of possible abuse, such as changes in behaviour or mood or an injury, are related to a child's condition without further exploration.
- Increased risk of isolation or bullying, including prejudice-based bullying.
- The possibility that bullying or other harmful behaviour may affect a pupil without outward signs being apparent.
- Communication differences or difficulties that affect how a pupil can describe or report a concern.

At Caelum House School and Play2Talk Nursery, we assess each child's individual support needs and provide appropriate support to help them communicate concerns and stay safe.

10. 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

11. 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

12. Complaints and concerns about school safeguarding policies

a. 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).

b. Other complaints

Any complaints from pupils, parents and/or carers are recorded and a written record is kept. All written complaints are investigated and parents and/or carers are notified of the outcome within 28 days of having received the complaint.

The record of complaints will be made available to Ofsted.

c. Whistleblowing Procedure

See Appendix 5 for the Whistleblowing Procedure.

13. Record-keeping

We will hold safeguarding records in line with our records retention schedule. All safeguarding concerns, discussions, decisions and the reasons for those decisions must be recorded in writing. If you are unsure whether something should be recorded, speak to the DSL.

Records should 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. These records will be stored securely and accessed only by people who have a professional need to see them. Information will be shared with staff or external agencies where necessary to safeguard the child, in line with information-sharing guidance and local safeguarding procedures.

Child protection records, including records relating to allegations of sexual abuse, will be retained in accordance with the school's records retention schedule. Digital child protection files will be password protected.

Transferring a child protection file

If a child for whom the school has, or has had, safeguarding concerns moves to another school or college, the DSL will ensure that their child protection file is transferred securely and separately from the main pupil file. The DSL will obtain confirmation that it has been received.

The file should be transferred as soon as possible and:

- Within **five days** for an in-year transfer; or
- Within the **first five days of the new term** where the child moves at the start of a term.

Where concerns are significant or complex, or children's social care is involved, the DSL will also speak to the DSL at the receiving school or college in advance where appropriate. This will give the receiving setting time to arrange support and safeguarding measures for the child.

Related procedures

- **Appendix 2** sets out the record-keeping arrangements for recruitment and pre-appointment checks.
- **Appendix 3** sets out the record-keeping arrangements for allegations of abuse made against staff.

14. Training

All staff will receive safeguarding and child protection training at induction, including whistleblowing procedures and online safety. This will help staff understand the school's safeguarding systems and their responsibilities, and recognise signs of possible abuse or neglect.

Training will be updated regularly and will:

- Form part of the school's wider approach to safeguarding, staff training and curriculum planning.
- Take account of advice from our safeguarding partners.
- Have regard to the EYFS and Teachers' Standards, including the expectation that teachers manage behaviour effectively to provide a safe environment and understand the needs of all pupils.

All staff will receive Prevent training so they can recognise concerns about a child being drawn into terrorism and know how to respond. Staff will also receive safeguarding and child protection updates, including online safety updates, as required and at least annually. These may be shared through emails, staff meetings or other training. Volunteers will receive training appropriate to their roles.

14.1 The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every two years. They will update their knowledge and skills at regular intervals, and at least annually, through activities such as reading safeguarding updates, meeting other DSLs and attending relevant training. They will also undertake Prevent awareness training.

14.2 Governors and trustees

Governors and trustees will receive safeguarding and child protection training, including online safety, at induction. This training will be updated regularly so that they:

- Understand their safeguarding responsibilities and can provide appropriate strategic challenge.
- Can assess whether the school's safeguarding policies and procedures are effective and support a whole-school approach to safeguarding.

The Chair of Governors may act as the case manager if an allegation of abuse is made against the Headteacher. They will receive training on managing allegations for this purpose.

14.3 Recruitment and interview panels

At least one person conducting an interview for a post at the school will have undertaken safer recruitment training. This will cover the relevant requirements in *Keeping Children Safe in Education* and take account of local safeguarding procedures. See **Appendix 2** for more information about our safer recruitment procedures.

14.4 Staff who have contact with pupils and families

Staff who have contact with children and families will receive supervision at least monthly. Supervision will provide support, coaching and training, promote children's interests, and allow confidential discussion of sensitive matters.

15. Monitoring arrangements

This policy will be reviewed annually. At every review, it will be approved by the full governing board.

16. 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 (including Acceptable Use statement and mobile phone use)
- Equal Opportunities
- Relationships and sex education
- First aid
- Curriculum
- Privacy notices
- Whistleblowing Procedure

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

Appendix 1: Types of abuse

Abuse, neglect and safeguarding concerns are rarely standalone issues that can be covered by one definition. In many cases, different forms of harm overlap.

Physical abuse

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 illness in a child or deliberately induces illness.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and adverse effects on their emotional development. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet another person's needs.
- Preventing a child from expressing their views, deliberately silencing them or making fun of what they say or how they communicate.
- Imposing expectations that are inappropriate for the child's age or development. This may include interactions beyond their developmental capability, overprotection, limiting exploration and learning, or preventing normal social interaction.
- Causing a child to see or hear the ill-treatment of another person.
- Serious bullying, including cyberbullying, that causes a child frequently to feel frightened or in danger.
- Exploiting or corrupting a child.

Sexual abuse

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

Sexual abuse may involve:

- **Physical contact:** Assault by penetration, such as rape or oral sex, or non-penetrative acts such as masturbation, kissing, rubbing or touching outside clothing.
- **Non-contact activities:** Involving a child in looking at or producing sexual images, watching sexual activities, encouraging a child to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including online.

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

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance misuse.

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

- Provide adequate food, clothing or shelter, including where a child is excluded from home or abandoned.
- Protect the child from physical or emotional harm or danger.
- Provide adequate supervision, including by using suitable caregivers.
- Ensure access to appropriate medical care or treatment.

Neglect may also include a failure to respond to a child's basic emotional needs.

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

Recruitment and selection

We are committed to safeguarding and promoting the welfare of children. People involved in recruiting staff who will work with children will receive appropriate safer recruitment training. We will apply the following procedures when recruiting and appointing staff.

Advertising

Job advertisements will make clear:

- Our commitment to safeguarding and promoting children's welfare.
- That safeguarding checks will be undertaken.
- The safeguarding responsibilities of the role, including the extent of contact with children.
- Whether the role is exempt from the Rehabilitation of Offenders Act 1974. Where it is exempt, applicants will be told that certain spent convictions and cautions are protected and do not need to be disclosed or taken into account.

Application forms

Our application forms will:

- State that it is an offence to apply for a role involving regulated activity with children if the applicant is barred from that activity.
- Include a copy of, or link to, this child protection and safeguarding policy and our policy on employing ex-offenders.

Shortlisting

At least two people will be involved in shortlisting. They will consider inconsistencies, gaps in employment and the reasons given for them, and explore any potential concerns.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record and any other information that may make them unsuitable to work with children. This gives candidates an opportunity to share relevant information before an interview. The declaration will cover, as applicable:

- Relevant criminal history.
- Whether the candidate is on the children's barred list.
- Whether they are prohibited from teaching.
- Relevant offences committed outside the UK and other overseas information.
- Confirmation that the information provided is true.

We will consider carrying out an online search of shortlisted candidates to identify publicly available information that may need to be explored at interview. Candidates will be informed that this may form part of our due diligence checks.

References and employment history

We will seek references before the interview where possible. Concerns raised in a reference will be explored with the referee and the candidate.

We will:

- Not accept open references.
- Contact referees directly and verify information where needed.
- Seek a reference from the candidate's current employer, completed by an appropriate senior person. For a school-based referee, we will seek confirmation from the headteacher or principal about the accuracy of information concerning disciplinary investigations.
- Verify the candidate's most recent relevant employment if they are not currently employed.
- Seek a reference from the last relevant employer where the candidate worked with children, if they are not currently doing so.
- Compare references with the application form and resolve inconsistencies or concerns before confirming an appointment.

Interview and selection

At interview, we will:

- Explore gaps in employment and frequent changes in employment or location.
- Discuss potential concerns relevant to the candidate's suitability to work with children.
- Record the information considered and the reasons for our decisions.

Pre-appointment checks and the single central record

All offers of appointment are conditional on satisfactory completion of the required pre-employment checks. We will record the checks carried out in the single central record (SCR) and retain copies in personnel files where appropriate, in line with the applicable requirements.

The checks required will depend on the role and may include:

- Identity and right to work in the UK.
- The appropriate enhanced DBS check and, where the role is regulated activity, children's barred-list information.
- Professional qualifications and status.
- Prohibition from teaching, section 128 and childcare disqualification checks where applicable.
- Appropriate checks for candidates who have lived or worked outside the UK.
- References and any concerns arising from the recruitment process.
- Fitness to carry out the responsibilities of the role.

We will keep evidence of right-to-work verification for the duration of employment and for two years afterwards. Where required checks have not been completed, a person will not begin work in a role for which the law or the EYFS framework requires those checks first.

Where a decision is made that the Childcare Disqualification Regulations do not apply to an individual, we will record the assessment, including any relevant risks, control measures and advice, on their personnel file.

Regulated activity and DBS checks

We will assess each role against KCSIE 2026, the statutory definition of regulated activity and the EYFS requirements to determine the correct level of DBS and barred-list check. We will not request children's barred-list information for someone who is not engaging in, or seeking to engage in, regulated activity.

The 2026 changes mean that frequent volunteering involving activities such as teaching, training, instructing or supervising children may be regulated activity even when supervised. Where it is regulated activity, we will obtain an enhanced DBS check with children's barred-list information.

Staff will be required to register with the DBS Update Service and maintain their registration during their employment with us.

Volunteers

We will assess each volunteer role and record the checks required. No volunteer without the required checks will be left unsupervised with children or allowed to carry out regulated activity.

Volunteers working within provision covered by the EYFS framework will not begin until the enhanced DBS certificate, including barred-list information where required by the EYFS framework, has been received.

Existing staff

We will carry out further checks where required by law, where concerns arise about a person's suitability, where their role changes to include regulated activity, or where other KCSIE or DBS requirements apply.

DBS referrals

We will refer a person to the Disclosure and Barring Service where the statutory referral conditions are met, including where they have been removed from regulated activity because they harmed a child or posed a risk of harm.

Agency staff, contractors and alternative provision

For agency and third-party staff, we will obtain written confirmation that the necessary checks have been completed and verify the identity of the person attending.

Contractors will be checked according to their role and the applicable regulated-activity requirements. A contractor who has not had the required checks will not work unsupervised with children or undertake regulated activity.

When we place a pupil with an alternative provision provider, we will obtain written confirmation that the provider has carried out the appropriate safeguarding checks on its staff.

Governors and trustees

The checks required for governors and trustees will be determined by the school's governance arrangements and their individual roles. Children's barred-list information will be requested only where an individual also engages in regulated activity with children. Section 128 checks will be carried out where applicable.

Appendix 3: Allegations and concerns about staff

Section 1: Allegations that may meet the harm threshold

This section applies where it is alleged that a current member of staff, supply teacher, volunteer or contractor has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes behaviour inside or outside school.

If we are unsure whether a concern meets the harm threshold, we will consult the local authority designated officer (LADO). We will deal with allegations promptly, fairly and consistently, protecting children while supporting the person who is the subject of the allegation.

The **case manager** will normally be the Head of School. If the allegation concerns the Head of School, the Chair of Governors will act as case manager. The case manager will be identified as early as possible.

Suspension while an allegation is considered

This section should be read alongside our Disciplinary and Grievance Policy. Suspension will not be the default response. It will be considered where there is reason to suspect that a child or other children are at risk of harm, or where the allegation is so serious that dismissal may be a possible outcome.

Before suspending someone, the case manager will assess the risk and consider whether another arrangement could protect children. Options may include:

- Redeploying the person so they have no direct contact with the child or children concerned.
- Arranging for another adult to be present when they have contact with children.
- Assigning work that does not give them unsupervised access to children.
- Moving a child to another class, after consulting parents or carers and making clear that this is not a punishment.
- Temporarily assigning the person to another suitable role or location.

The case manager will seek advice from the school's personnel adviser, the LADO and, where involved, the police or children's social care.

Possible outcomes of an investigation

- **Substantiated:** There is sufficient evidence to prove the allegation.
- **Malicious:** There is sufficient evidence to disprove the allegation and a deliberate act to deceive or cause harm.
- **False:** There is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** There is insufficient evidence to prove or disprove the allegation. This does not imply guilt or innocence.
- **Unfounded:** There is no evidence or proper basis to support the allegation.

Procedure for dealing with allegations

Where an allegation may meet the harm threshold, the case manager will:

- Make basic enquiries to establish the facts, without jeopardising a police or children's social care investigation.
- Discuss the allegation with the LADO to consider its nature and context, agree the next steps and decide whether the police or children's social care should be involved. If immediate police contact is necessary, the case manager will inform the LADO as soon as practicable afterwards.
- Inform the person facing the allegation of the concern and likely next steps as soon as appropriate following discussion with the LADO. Where the police or children's social care are involved, only information agreed with those agencies will be shared.
- Assess whether suspension is necessary or whether another arrangement can protect children. Advice will be sought from the LADO and other agencies as appropriate.
- Discuss any concerns about other children, including children in the person's family or community, with the DSL and assess whether a referral to children's social care is needed.
- If immediate suspension is necessary, record the reasons, the alternatives considered and why they were rejected. Written confirmation will be provided within one working day. The person will be given a named school contact.
- If no further action is needed, record the decision and its reasons, and agree with the LADO what will be communicated to the person concerned and anyone else affected.
- If further action is needed, take the steps agreed with the LADO and liaise with the police or children's social care where appropriate.
- Support the person facing the allegation through a named representative who will keep them informed. They may also seek support from a trade union representative, a colleague or the Employee Assistance Programme.
- Inform the parents or carers of the child involved as soon as appropriate, subject to any agreement with the

police or children's social care. They will be kept informed about matters concerning their child, while the staff member's confidential information is protected.

- Consider whether the statutory conditions for a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) are met.

We will notify Ofsted of allegations of harm or abuse by a person living, working or looking after children on premises used for our EYFS provision, and of the action taken. Notification will be made as soon as reasonably practicable and within 14 days, in accordance with the EYFS requirements.

If the Secretary of State makes an interim prohibition order concerning an individual, we will immediately suspend them from teaching pending the TRA investigation. Where the police are involved, we will ask at an early stage whether relevant statements and evidence may later be shared for the school's disciplinary process.

Timescales

We will deal with allegations as promptly as possible. Where reasonably practicable, we will aim to:

- Resolve cases that are immediately clear to be unsubstantiated or malicious within one week.
- Take appropriate action within three working days where formal disciplinary action is not required.
- Hold a disciplinary hearing within 15 working days where no further investigation is needed.

These are aims rather than fixed deadlines. Where they cannot be met, we will progress the case as quickly as possible.

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether further action, including disciplinary action, is appropriate. This decision will take account of information provided by the police and children's social care.

Conclusion of a substantiated case

Where an allegation is substantiated and the person is dismissed, their services are no longer used, or they resign or otherwise cease providing services, we will consider our duty to refer them to the DBS. If the person is a teacher, we will also consider whether to refer the matter to the TRA.

Returning to work after suspension

If a suspended person returns to work, the case manager will plan how to support their return. They will also consider how to manage contact with the child or children who made the allegation, if they still attend the school.

Unsubstantiated, unfounded, false or malicious allegations

The case manager, with the LADO where involved, will consider whether the child or person who made the allegation needs support. A referral to children's social care may be appropriate where an allegation appears to have been a request for help.

If an allegation is shown to have been deliberately invented or malicious, the school will consider whether any action is appropriate in relation to the person who made it.

Confidentiality and information sharing

We will protect confidentiality and guard against unwanted publicity while an allegation is considered or investigated. The case manager will seek advice from the LADO, police or children's social care, as appropriate, about:

- Who needs to know about the allegation and what may be shared.
- How to manage speculation, leaks or gossip.
- What information may be shared with parents or carers and the wider school community.
- How to respond to any press interest.

Record-keeping

The case manager will maintain a clear and confidential record of an allegation that may meet the harm threshold.

Following an investigation, details of an allegation found to be **malicious or false** will be removed from the person's personnel record unless they consent to its retention. For other allegations, the record will include:

- A clear summary of the allegation.
- Details of how it was followed up and resolved.
- Any action taken, decisions reached and the outcome.
- Whether the information may be referred to in a future reference.

A copy will be provided to the person concerned, subject to any appropriate agreement with the police or children's social care. Records will be retained at least until the person reaches normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employment references, we will not include allegations found to be false, unfounded, unsubstantiated or malicious. We will include substantiated allegations where relevant, ensuring that the information is factual and does not contain opinion.

Learning lessons

After a substantiated allegation, the case manager will review the case with the LADO to identify any improvements needed in our procedures or practice. This will include considering the decision to suspend, the length of any suspension, and whether a similar case could be managed without suspension.

For other outcomes, the case manager will consider whether the facts reveal any lessons or improvements.

Non-recent allegations

Abuse can be reported regardless of how long ago it happened. We will report non-recent allegations made by a child to the LADO in line with local procedures. If an adult tells us that they were abused as a child, we will advise them to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

This section applies to concerns about staff, supply teachers, volunteers and contractors that do not meet the harm threshold in Section 1. Concerns may arise through a suspicion, complaint, disclosure or pre-employment check. We will respond to them promptly to safeguard children.

What is a low-level concern?

A low-level concern is any concern, however 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 conduct outside work; and
- Does not meet the harm threshold or otherwise warrant referral to the LADO.

Examples may include being overly friendly with children, having favourites, taking photographs of children on a personal phone, meeting a child alone in a secluded place, or using inappropriate sexualised, intimidating or offensive language.

Sharing low-level concerns

We will encourage staff to raise concerns and to self-refer where they believe their own conduct could be misunderstood or has fallen below expected standards. We will support this culture by explaining expected behaviour, addressing concerns sensitively and proportionately, and identifying any wider weaknesses in our safeguarding arrangements. Staff should follow the reporting route in **section 7.7** of this policy.

Responding to low-level concerns

The Head of School, or a nominated deputy, will gather information as needed. Where a concern comes from a third party, this may involve speaking to the person who raised it, the adult concerned and any witnesses. The Head of School will decide what action is appropriate under the staff code of conduct. If there is doubt about whether the harm threshold is met, we will consult the LADO.

Where a concern relates to a supply teacher or contractor, we will notify their employer so that any wider pattern can be identified.

Recording low-level concerns

All low-level concerns will be recorded in writing. The record will include the concern, its context, action taken and reasons for decisions. Records will be kept confidential and secure, reviewed for patterns, and retained at least until the person leaves their employment with the school.

Where a pattern suggests that the harm threshold may be met, we will refer the matter to the LADO. We will also consider whether changes to school practice, policy or training are needed.

References

Low-level concerns will not be included in references unless they relate to matters that would normally be included, such as substantiated misconduct or poor performance, or a group of concerns has met the harm threshold and been substantiated.

Appendix 4: Specific safeguarding issues

Staff should report concerns about any of the issues below to the DSL or a deputy and follow the procedures in **section 7**. If a child is in immediate danger, staff must take immediate protective action and contact the police or children's social care as appropriate. The absence of the DSL must not delay a referral.

Children missing from education

A child missing education, particularly repeatedly or for a prolonged period, may be at risk of abuse, neglect, exploitation or other harm. Staff should consider the child's individual circumstances rather than assume there is one explanation for their absence.

We will follow our attendance and children-missing-education procedures, make reasonable enquiries and share information with the local authority where required. This includes notifying the local authority when a child leaves without a new school being identified and following the rules for removing a child from the admission register.

Staff will report unexplained or concerning absence to the DSL promptly. Where a child is suffering, or is likely to suffer, harm, an immediate referral will be made to children's social care and, where appropriate, the police. See **section 7.14** for our attendance procedures.

Child criminal exploitation

Child criminal exploitation (CCE) occurs when a person or group uses an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, for someone else's benefit, or through violence or threats. A child can be exploited even when their involvement appears voluntary. Exploitation can happen online as well as in person.

Examples include forcing or coercing a child to move drugs or money, work in a cannabis factory, shoplift, pickpocket or threaten others. Possible indicators include:

- Unexplained gifts or possessions.
- Associations with people involved in exploitation.

- Changes in emotional wellbeing or substance use.
- Going missing, returning home late or missing education.

Staff who suspect CCE will speak to the DSL promptly. The DSL will follow local safeguarding procedures and consider referral to children's social care and the police.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse in which a person or group uses an imbalance of power to coerce, manipulate or deceive a child into sexual activity. A child may receive something they need or want, or the perpetrator may gain financially or in status. The child may not recognise the situation as abuse and may believe they are in a consensual relationship.

CSE may involve physical contact or non-contact activity, including sexual images, messages or activity online. Indicators can include those listed under CCE, as well as a relationship with a significantly older person, sexually transmitted infections or pregnancy. No single indicator proves exploitation.

Staff who suspect CSE will speak to the DSL promptly. The DSL will follow local safeguarding procedures and consider referral to children's social care and the police.

Child-on-child abuse

Child-on-child abuse can happen inside or outside school, in person or online. It includes bullying, abuse in intimate relationships, physical abuse, sexual violence, sexual harassment, coercion into sexual activity, sharing nude or semi-nude images, upskirting and initiation or hazing behaviour.

The school has a zero-tolerance approach to sexual violence and sexual harassment. An absence of reports does not mean abuse is not happening. Staff must take concerns and reports seriously, reassure the child and follow **section 7.8**. When responding to harmful sexual behaviour, we will consider the children's ages, development and support needs, including whether a child displaying harmful behaviour may have experienced abuse themselves.

Domestic abuse

Domestic abuse may occur between intimate partners or family members and may include teenage relationship abuse or child-to-parent abuse. It can take place inside or outside the home. Children who see, hear or experience the effects of domestic abuse are victims in their own right.

Staff will report concerns to the DSL and follow the safeguarding procedures in section 7.

Homelessness

Homelessness, or the risk of homelessness, can affect a child's safety and welfare. The DSL and deputies will know how to contact the relevant local housing authority and raise concerns in line with local procedures. Where a child has been harmed or is at risk of harm, the DSL will also consider a referral to children's social care.

So-called ‘honour-based’ abuse

So-called ‘honour-based’ abuse includes female genital mutilation (FGM), forced marriage and breast ironing. It may involve pressure or abuse from more than one family or community member. All forms are abuse and will be treated as safeguarding concerns.

Staff will report any concern to the DSL promptly. They must not approach family members or investigate the concern themselves where doing so could increase the child’s risk.

Female genital mutilation

The DSL will ensure staff are trained to recognise and respond to concerns about FGM. Possible indicators may include a child disclosing that FGM has happened or is planned; difficulties walking, sitting or using the toilet; unexplained pain; changes in behaviour; or concern about a planned trip or “special procedure”. Indicators must be considered in context and are not proof on their own.

Staff should follow **section 7.3** if they suspect a child is at risk or learn that FGM has taken place. Teachers have a separate legal duty to report to the police when, in the course of their work, they discover that FGM appears to have been carried out on a girl under 18.

Forced marriage

Forced marriage is a marriage entered into without the full and free consent of one or both parties, where violence, threats or another form of coercion is used. Staff should be aware that they may have only one opportunity to speak safely with a child who is at risk.

If a child raises a concern, staff should listen in a private and safe setting and report it to the DSL immediately. The DSL will follow local safeguarding procedures, seek specialist advice where needed and consider a referral to children’s social care or the police. Staff must not contact the family or attempt mediation where this may increase the child’s risk.

Preventing radicalisation

Radicalisation is the process by which someone comes to support terrorism. There is no single reliable indicator. Staff should consider changes in behaviour in context, including whether a child appears to be exposed to extremist material, pressured by others or increasingly supportive of violence. A child’s religion or change in religious practice is not, on its own, evidence of radicalisation.

The DSL will maintain a Prevent risk assessment, ensure appropriate staff training and consider concerns under **section 7.5**. Staff should report concerns promptly and seek advice rather than investigate them themselves.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between children of any age or sex, individually or in groups, in person or online. They may overlap and can seriously affect a child’s wellbeing and education.

A child who reports an incident must be listened to, taken seriously, supported and kept safe. They must not be made to feel ashamed or responsible for creating a problem. Staff will challenge inappropriate sexual language and behaviour and follow the reporting and response procedures in **section 7.8**.

Serious violence

Indicators that a child may be at risk of, or involved in, serious violence can include changes in attendance or friendships, unexplained injuries or possessions, a decline in wellbeing or performance, and signs of exploitation. Staff should consider the child's circumstances and report concerns to the DSL promptly.

Visitors and visiting speakers

Visitors will sign in, verify their identity when requested and wear a visitor badge. Staff will check the reason for a visit and apply the school's procedures for supervision and any necessary safeguarding checks. Visiting professionals may be asked for identification and confirmation from their organisation that appropriate checks have been completed.

The school will assess visiting speakers and organisations using its premises to ensure that their activities do not place children at risk or promote extremism.

Related school procedures

- **Non-collection of children:** See section 7.12.
- **Missing pupils:** See section 7.13.
- **Pupils absent from education:** See section 7.14.

Appendix 5: Whistleblowing procedure

1. Aims

This procedure aims to:

- Encourage people to report suspected wrongdoing promptly, knowing their concerns will be taken seriously and handled confidentially where possible.
- Explain how staff and others working for the school can raise concerns about wrongdoing.
- Set out how the school will respond to those concerns.
- Explain the protection available to workers who make a protected disclosure.
- Make clear that a person who raises a concern genuinely will not be victimised because the concern is not substantiated.

This procedure does not form part of any employee's contract of employment and may be amended. It applies to employees and others who provide services to the school, including agency workers, consultants and

contractors. Whether an individual has legal protection under whistleblowing law depends on their employment status and the circumstances of their disclosure.

2. Legislation and guidance

This procedure takes account of the Public Interest Disclosure Act 1998 and current government guidance on whistleblowing.

3. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing in the public interest. Concerns may relate to:

- A criminal offence, such as fraud or corruption.
- A danger to the health or safety of pupils, staff or others.
- A failure to comply with a legal obligation.
- A breach of financial management procedures.
- Damage to the environment.
- An attempt to conceal any of the above.

Personal employment grievances, such as a concern about an individual contract, are usually dealt with under the staff grievance procedure. However, a concern that also affects others or is in the public interest may be a whistleblowing concern. Staff who are unsure which procedure applies can seek advice.

4. Raising a concern

4.1 Who to contact

Concerns about a member of staff, visitor or volunteer should be raised with the **Head of School**. Concerns about the Head of School should be raised with the **Chair of Governors**.

If a child may be at risk of harm, staff must also follow the school's safeguarding procedures without delay. The whistleblowing process must not delay a necessary referral to children's social care or the police.

4.2 How to raise a concern

Concerns should be put in writing where possible. The report should explain what happened, when and where it happened, who was involved, and any evidence or context available. The person raising the concern should also disclose any personal interest in the matter.

A lack of written evidence should not prevent someone from raising a genuine concern.

5. How the school will respond

5.1 Initial assessment and investigation

The person receiving the concern—the Head of School or Chair of Governors, as appropriate—will:

- Meet the person raising the concern within a reasonable time. They may be accompanied by a trade union or professional association representative.
- Record the concern and gather enough information to decide what action is needed.
- Explain how the concern will be handled and, where possible, when the person can expect an update.
- Refer the matter to the appropriate procedure if it is not a whistleblowing concern.
- Arrange a further investigation where needed. This may involve an independent investigator or referral to an external authority, including the police.

The school will protect the person raising a genuine concern from unfair treatment because they have spoken up. Confidentiality will be respected as far as possible, although information may need to be shared to investigate the concern or protect others.

5.2 Outcome

At the end of the investigation, the investigator will record the findings, any action required and any recommendations to prevent the wrongdoing happening again. This may include a referral to an external organisation.

The person who raised the concern will be told the outcome as far as confidentiality allows. The Head of School and Chair of Governors will review any relevant policies or procedures where improvements are needed.

We cannot guarantee a particular outcome, but we will handle concerns fairly and take appropriate action.

6. Deliberately false or malicious allegations

Staff are encouraged to raise concerns they genuinely believe may indicate wrongdoing. No disciplinary action will be taken simply because an investigation does not substantiate a concern raised genuinely.

If an allegation is found to have been deliberately invented or made maliciously, the school will consider whether disciplinary action is appropriate.

7. Raising concerns outside the school

Staff are encouraged to use the internal reporting route where appropriate, but they may report a concern to an external body. The correct body depends on the subject of the concern. Staff can consult the government's current **list of prescribed people and bodies** to identify the appropriate contact.

A person may seek independent advice before making an external disclosure. If there is an immediate risk to a child, they should contact children's social care or the police without waiting for the internal process.

Appendix 6: 2026 statutory compliance checklist

The DSL, Head of School and governing body will use this checklist as part of the annual safeguarding review.

Keeping Children Safe in Education 2026

- ☐ All staff have read **KCSIE 2026 Part One** in full.
- ☐ The withdrawn condensed Annex A is not used as a substitute for Part One.
- ☐ The DSL and Deputy DSLs are clearly identified, with appropriate cover arrangements.
- ☐ Staff receive safeguarding training at induction and updates at least annually.
- ☐ Online safety, filtering and monitoring arrangements are reviewed and recorded at least annually.
- ☐ Procedures address self-generated intimate images and videos, including material generated or altered using artificial intelligence.
- ☐ Procedures address child-on-child abuse, sexual harassment, sexual violence and harmful sexual behaviour.
- ☐ Safeguarding practice addresses exploitation, serious violence, mental health, domestic abuse and online harms.
- ☐ Safeguarding assessments consider SEND and barriers to communication or disclosure.
- ☐ Concerns and allegations about staff, including low-level concerns, are recorded and managed appropriately.
- ☐ Staff know how to raise a whistleblowing concern.
- ☐ Staff understand when safeguarding information should be shared and that data protection law does not prevent appropriate sharing.
- ☐ Safer recruitment, DBS and barred-list arrangements reflect the 2026 changes to regulated activity.

Early Years Foundation Stage 2026

- ☐ The EYFS DSL is identified and appropriately trained.
- ☐ EYFS practitioners receive safeguarding training that meets **Annex C** of the EYFS framework. Training is renewed every two years, with updates where required.
- ☐ EYFS induction covers safeguarding, child protection, health and safety, and emergency evacuation.
- ☐ Staff supervision provides opportunities to discuss child protection and children's wellbeing.
- ☐ Required enhanced criminal record and barred-list checks are completed for relevant people aged 16 and over, including volunteers, subject to any applicable statutory exception.
- ☐ New EYFS employees and volunteers do not begin work before the checks required prior to starting have been completed.
- ☐ At least one person with a current full paediatric first aid certificate is available whenever EYFS children are present and accompanies children on outings. Certificates are renewed every three years.
- ☐ EYFS absences are followed up and attendance patterns are reviewed for safeguarding concerns.
- ☐ Procedures cover notification to Ofsted of relevant allegations of harm or abuse, including the 14-day deadline.
- ☐ Banned dog breeds are not kept or present on premises used for EYFS provision.
- ☐ Safer-sleep arrangements are followed where applicable.
- ☐ The school has regard to Department for Education guidance on screen use in early years settings.
- ☐ Toileting and intimate care arrangements balance children's privacy with safeguarding and support needs.
- ☐ EYFS accident, injury, first aid, safeguarding and attendance records are maintained securely.
- ☐ Parents and carers have access to the required EYFS information and complaints arrangements.

This checklist supports the annual review. It does not replace the statutory guidance or the school's detailed procedures.