Safeguarding and child protection

Interim addendum to the September 2026 policy

Burdett-Coutts & Townshend Foundation CE Primary School
Prepared 4 November 2026

This addendum updates the school's policy in response to Keeping children safe in education 2026 (KCSIE), in force from 1 September 2026. It should be read first and alongside the policy that follows. Where wording differs, this addendum takes precedence over the relevant policy wording, including the visitor flowchart, until the changes are incorporated into a fully revised policy. Other provisions continue to apply.

It covers substantive 2026 changes relevant to our school and essential clarifications needed to apply them safely. It does not replace KCSIE or the local safeguarding partnership's procedures. For children aged 0 to 5, it must also be read alongside section 3 of the current EYFS statutory framework.

1 Staff understanding and safeguarding cover

All staff, including those who do not work directly with children, are expected to read Part one of KCSIE 2026 in full. The former condensed Part one has been removed. The published overview complements Part one and does not replace it. Leaders will support staff understanding through induction, training and updates.

The DSL will ensure robust cover during illness, leave and other absences, with a trained deputy and a secure reporting system accessible to authorised safeguarding staff. Concerns must be received and acted on without delay. Staff must know who is covering and how to contact them. The DSL retains lead responsibility; deputies are trained to the same standard.

2 Early support and Family Help

Section 1.5 is supplemented by the distinction between universal services and community-based early help, and the targeted early help level of Family Help. Family Help also encompasses support under section 17 of the Children Act 1989. Staff and the DSL will follow local thresholds, assessment protocols and referral arrangements, including how appropriately qualified practitioners may lead assessments.

Early support must not delay a referral where there is reasonable cause to suspect significant harm. The school will work with children and families and seek agreement where appropriate, but the consent wording in sections 1.5 and 1.7 must not be treated as a barrier to necessary safeguarding information sharing or protective action.

Sources: KCSIE 2026 summary; Part one paragraphs 6 and 13; Part two paragraphs 127–137; Annex B. Relevant policy sections: 1.4–1.10 and 2.1.

3 Information sharing and records

Data protection laws, including the Data (Use and Access) Act 2025, do not prevent necessary safeguarding information sharing. Staff will share relevant, necessary and proportionate information lawfully, securely and promptly, with appropriate context. Consent is not always required. The DSL will seek data protection or legal advice where needed, without allowing uncertainty to delay protection of a child.

Records must include the concern, discussions, action, decisions and reasons, including reasons for sharing or not sharing information and for making or not making a referral. Access is restricted to those who need it for safeguarding. Sections 1.2 and 1.7 must not prevent secure sharing with appropriate professionals.

Child protection files will be transferred securely and separately from the main pupil file, with receipt confirmed, as soon as possible and within five days for an in-year transfer or the first five days of a new term. Relevant risk information should also be shared before arrival where appropriate. The receiving DSL should assess risks to the child and others and arrange a safety and support plan where needed. These transfer timescales clarify an existing expectation.

Sources: KCSIE 2026 paragraphs 104–106 and 142–152; Annex B. Relevant policy sections: 1.2 and 1.7.

4 Recruitment volunteers and visitors

Supervision alone no longer removes a volunteer from regulated activity. Teaching, training, instructing or supervising children frequently, on more than three days in a 30-day period, or overnight may constitute regulated activity, including where the period condition is met across settings. The school will apply the full definition in Part three, obtain the appropriate enhanced DBS check with children's barred list information, and review existing volunteers affected by the September 2026 change.

For existing volunteers newly in regulated activity, barred list status must be checked in accordance with KCSIE paragraph 385. Staff and volunteers must not begin work within EYFS settings until the school has received their enhanced DBS certificate including barred list information. Supervision or a standalone barred list check does not override this EYFS requirement.

For volunteers outside regulated activity, a written risk assessment will determine appropriate checks and supervision. An unchecked volunteer must never work unsupervised or undertake regulated activity. These provisions supersede any implication in section 1.3 or the visitor flowchart that supervision replaces required vetting.

Visitors will be assessed according to their role, purpose and contact with children. Photo ID and a DBS certificate do not automatically authorise unsupervised access. The school will verify identity, obtain role-appropriate checks or written assurances, and determine supervision. Agency staff, trainee teachers, contractors, visiting professionals and self-employed providers must be considered separately under Part three. A badge alone does not evidence every required check. This replaces the broad assurances in sections 4.1–4.3 and the green branch of the visitor flowchart.

Teaching status and prohibition checks will use DfE's Check a teacher's record. DBS Update Service arrangements, including the certificate joining window, will follow current KCSIE requirements. The school will fulfil DBS referral duties where the criteria are met, including cases involving volunteers.

Sources: KCSIE 2026 Part three, especially paragraphs 313, 317, 328–331 and 383–390. Relevant policy sections: 1.3, 1.13 and 4.1–4.4.

5 Abuse exploitation and prejudice

Staff must recognise overlapping risks, including modern slavery, financial exploitation, stalking, child-to-parent or caregiver abuse, and emotional abuse through persistent criticism, belittling or name-calling. Sexual abuse includes contact and non-contact activity, may occur online, and is often committed by someone the child knows. Children under 13 cannot consent to sexual activity.

CCE and CSE may involve individuals, organised networks or gangs. A child may identify with the group, fail to recognise exploitation, or commit offences under coercion. Apparent agreement or offending does not remove their status as a victim. Where a potential victim is identified, the DSL will arrange relevant child protection and modern slavery referrals, working with an authorised first responder for the National Referral Mechanism where required.

Racism, faith-based prejudice, misogyny, misandry and other discriminatory behaviour must be recognised, challenged and considered within safeguarding practice where appropriate. Staff will consider their impact on wellbeing, mental health and willingness to seek help. Preventative education will be age appropriate and aligned with the current Relationships and Health Education guidance.

6 Child on child abuse including harassment and violence

Child-on-child abuse is preventable and is a safeguarding concern for both the child harmed and the child alleged to have caused harm. Staff must act promptly, including where there is serious physical harm or threats involving weapons. Abuse must never be dismissed as banter, normal development or an inevitable part of growing up.

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, including apparently consensual incidents and AI-generated material. This terminology replaces “sexting” and “youth produced sexual imagery” in sections 3.1–3.2. Staff must report to the DSL and must not copy, print, forward or save the imagery, or ask a child to do so. Any exceptional decision to view imagery rests with the DSL under current UKCIS guidance.

The DSL will use KCSIE Part five to assess sexual behaviour in the context of age and development, determine immediate protection and support, and consider referral to Family Help, children’s social care or the police as appropriate. Sexual violence requires an immediate risk and needs assessment; sexual harassment requires consideration of one. Plans will address the child harmed, the alleged perpetrator and other children, be recorded and reviewed, and take account of the child’s wishes without allowing these to prevent necessary protection.

Sources: KCSIE 2026 Part one, especially paragraphs 17–45; Part two child-on-child abuse; Part five; Annex A. Relevant policy sections: 3.1–3.2 and 3.7–3.9.

7 Additional vulnerabilities and support

Section 3.12 applies to all children with SEND or relevant health conditions, whether or not they have an EHCP. Staff must consider barriers arising from intimate care, isolation, dependence on adults and difficulty recognising or reporting abuse. The DSL and SENCO will arrange accessible communication and appropriate support.

Staff will identify young carers and consider the effect of caring on attendance, wellbeing and learning, working with families and relevant services. Mental health concerns may indicate abuse, neglect or exploitation and must be considered alongside safeguarding risks. Staff identify concerns and seek appropriate support; diagnosis is for trained professionals.

A medical incident, including an allergy incident, does not automatically warrant a safeguarding referral. The DSL will consider whether it reveals a risk of neglect, abuse or exploitation, including repeated absence of essential medication. Notifications about temporary accommodation and domestic abuse, including Operation Encompass, will inform timely support and any necessary safeguarding referral.

Sources: KCSIE 2026 mental health sections; paragraphs 248–252; Annex A on domestic abuse and temporary accommodation.

8 Online safety and mobile phones

The school's approach will address content, contact, conduct and commerce risks, including misinformation, disinformation, misogynistic content, financial scams, AI-generated sexual imagery and harmful interactions with generative AI applications. Any staff-facing or pupil-facing AI use must be considered against DfE guidance, safeguarding, data protection and age-appropriate use requirements.

Filtering and monitoring effectiveness will be reviewed at least once every academic year by the responsible senior leader, supported by the DSL and IT support. Reviews will include documented checks across all internet-connected devices and relevant locations. Relevant staff must understand responsibilities and how to escalate concerns. This makes the annual review in section 3.14 more specific.

The school will consider an annual online safety review supported by a risk assessment reflecting pupils' actual risks. Cyber security and access controls form part of safeguarding and will be considered against DfE standards.

Pupils should not have access to mobile phones throughout the school day, including breaks and lunchtime, except through agreed exceptions. The school will set out practical arrangements and any necessary individual exceptions in its mobile phone arrangements and linked policies. The existing prohibition on staff using personal devices to photograph children continues to apply.

Sources: KCSIE 2026 paragraphs 164–181. Relevant policy sections: 3.10 and 3.14.

9 Concerns about adults and external providers

The procedures in section 1.11 apply to all relevant adults, including supply staff, trainee teachers, volunteers and contractors. The school retains safeguarding responsibility alongside the employing agency, training provider or other organisation and will work with them and the LADO as appropriate.

All concerns about adult conduct, however small, must be reported promptly to the Head Teacher, or to the Chair of Governors if they concern the Head Teacher. Low-level concerns are recorded and considered under Part four and the staff code of conduct. The harm thresholds in section 1.11 determine the allegations route; where there is doubt, advice must be sought from the LADO. The school must not undertake an investigation that could prejudice statutory enquiries.

Where organisations use school premises, including for clubs or coaching, the school will seek appropriate safeguarding assurances and follow its procedures, including LADO referral where appropriate, if concerns arise. These statements clarify existing expectations as well as the 2026 emphasis on trainee teachers and shared responsibilities.

Sources: KCSIE 2026 Part four; Part two on use of premises. Relevant policy sections: 1.11, 2, 3.16 and 4.2–4.3.

10 Physical contact and restrictive intervention

Section 3.3 must be read alongside the current DfE guidance Restrictive interventions, including use of reasonable force, in schools. Force must be reasonable in the circumstances, use no more than is necessary and last for the shortest necessary time. Staff will consider individual needs, reasonable adjustments, de-escalation and proactive support, particularly for children with SEND, mental health needs or medical conditions. A lack of training must not prevent lawful, necessary action to protect a child in an emergency. Recording, reporting and follow-up must follow the current guidance and the school's revised Positive Handling arrangements.

Sources: KCSIE 2026 paragraphs 205–207. Relevant policy sections: introduction, 3.3 and 5.

11 Children questioning their gender

Staff will listen respectfully, challenge discriminatory bullying and avoid assumptions based on interests, clothing or gender stereotypes. The school will consider the child's wider experiences, wellbeing and any additional needs. A child questioning their gender should receive sensitive support.

Staff must not initiate social transition or independently implement requested changes. Requests from a child or parent for the school to support social transition must be considered through a documented school decision involving the DSL, with regard to KCSIE paragraphs 254–277, safeguarding, equality and human rights obligations, the welfare of the child and other children, and relevant professional or clinical advice.

Parents or carers should be involved as a priority and their views given great weight. In the rare circumstances where involving them would create a greater risk to the child, the DSL must determine safeguarding action before contact or decisions. Where a child merely confides feelings and does not request changes, confidentiality should not be broken solely for that reason unless there is a related safeguarding risk; usual safeguarding procedures apply.

The school will take a particularly careful approach for primary-aged children. KCSIE expects support for full social transition at primary age to be agreed very rarely and emphasises early clinical involvement. School staff must not take on the role of clinicians. Decisions, reasons, arrangements and reviews will be recorded.

12 Toilets changing facilities and sport

The school will apply KCSIE paragraphs 97–100 and 107–118 to protect pupils' safety, privacy, comfort and dignity. Children must not use toilets designated for the opposite biological sex. Separate toilets must be provided for boys and girls aged eight and over, except individual toilets in a room that locks from the inside and is intended for one pupil at a time.

Children aged 11 or over at the start of the school year must not undress in front of a child of the opposite biological sex. When responding to requests for social transition, pupils must not be admitted to changing rooms designated for the opposite sex. Where needed, appropriate private alternatives may be considered without compromising single-sex facilities or the safety and dignity of any child. Arrangements must be recorded, communicated appropriately and reviewed.

Sport must be safe and fair, taking account of age, the nature of the activity and relevant national governing body guidance. Where single-sex participation is necessary for safety, there can be no exceptions. Other participation requests must be considered individually under the guidance, taking account of welfare, fairness and the impact on other children.

Sources: KCSIE 2026 Part two sections on sport, school premises and children questioning their gender. Relevant policy sections: 3, 3.16 and 4.

Applying and reviewing this addendum

Leaders will brief staff on the changes, review relevant procedures and linked policies, and provide governors with assurance on implementation. The addendum will be incorporated into the next full revision. Its preparation date does not amend the existing policy's record of governing body adoption.

Primary reference: Department for Education, Keeping children safe in education 2026, September 2026; Annex C summarises changes from 2025. Available at www.gov.uk/government/publications/keeping-children-safe-in-education--2. Comparison completed 4 November 2026.



Burdett-Coutts

SAFEGUARDING & CHILD PROTECTION

Contents

Purpose of this Policy 4
Introduction 4
Definition of Safeguarding 4
What is Child Protection? 5
Aims of this Policy 5
1. Responsibilities, Training and Procedures 6
1.1: Staff Conduct 6
1.2: Confidentiality and GDPR 6
1.3: Safer Recruitment Practices 7
1.4: Designated Safeguarding Lead (DSL) 8
1.5: Early Help 8
1.6: Process for Referring Pupils 8
1.7: Records of Child Protection and Safeguarding Concerns 9
1.8: Training for all Staff, Governors and Trustees 9
1.9: Induction Training 10
1.11: Allegations against a member of staff 10
1.12: Whistleblowing 11
1.13: Single Central Record (SCR) 11
2. Governors 12
2.1: Requirement to Read Guidance 12
2.2: Designated Link Governor 12
3.1: Teaching Pupils about Safeguarding 12
3.2: Child-on-Child abuse (Managing allegations against other pupils) 13
3.3: Physical Contact and Restraint 13
3.4: Female Genital Mutilation (FGM) 13
3.5: Preventing Radicalisation 14
3.6a: Missing Children 15
3.6b: Children who are absent from Education (this is not the same as children absent from education) 15
3.8: Grooming 16
3.9: Child Criminal Exploitation (CCE) including County Lines 16
3.10: Photographing Children 16
3.11: Parents taking photos of school events 17
3.12: Children with Education Health & Care Plan (EHCP) 17
3.13: Children with Court Orders in place 18

3.14: Online Safety & Social Media 18
3.15: Transporting Pupils 18
3.16: Before and After School Activities and Educational Visits 19
4. Site Safety 19
4.1: Visitors to the School 19
4.2: Agency Staff: 21
4.3: Peripatetic and Specialist Staff (including sports coaches): 21
4.4: Should We Keep Documents Evidencing Identity? 21
5. Links to other policies 21

Policy Written	January 2021
Policy Amended	September 2024
Adopted by Governing Body	September 2021, 2022, 2023, 2024, 2025, 2026
Review Date	September 2027

We would like to acknowledge the work of other colleagues in the drafting of this policy. We have drawn on a range of sources including policies from other schools, good practice guides, published schemes, LDBS, LA and any statutory guidelines where appropriate.

Purpose of this Policy

This policy sets out the Governing Body's commitment to safeguarding the children in our school and describes in:

- Section 1: the responsibilities, training and procedures for those with a particular remit.
- Section 2: details the roles and responsibilities of the Governors.
- Section 3: describes our support for the child and identifying specific safeguarding issues
- Section 4: outlines site security with specific emphasis on visitor management
- Section 5: provides key safeguarding policies and procedures available to support safeguarding in our school.

Introduction

The Governing Body fully recognises that it has a duty to ensure arrangements are in place for safeguarding and promoting the wellbeing of children (Section 175/157 of the Education Act 2002 amended 2012). We adhere to the Westminster's Local Safeguarding Children Partnership procedures.

This policy reflects the requirements outlined in the following statutory guidance:

- Keeping Children Safe in Education (KCSIE) (September 2026)
- Working Together to Safeguard Children 2026
- Information Sharing (July 2018; updated Sept 2026)
- What to do if you are worried a child is being abused (March 2015)
- Use of reasonable force: Advice for head teachers, staff and governing bodies (July 2013, updated Dec 2025)
- 'Prevent Duty Guidance for England and Wales' 2023
- Early years foundation stage statutory framework For group and school-based providers (Sept 2026)
- https://www.gov.uk/government/publications/early-years-inspection-toolkit-operating-guide-and-information (Sept 2025; updated Aug 2026)

Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined as: 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; and taking action to enable all children to have the best outcomes.

We aim to protect our children from all kinds of abuse whether physical, emotional, sexual or neglect.

What is Child Protection?

Child protection (CP) is an aspect of safeguarding but is focused on the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect.

Aims of this Policy

We recognise that all members of the school community, including volunteers and Governors, will at all times play a full and active part in protecting our children from harm. We operate a whole school approach to safeguarding, with a zero-tolerance approach to any form of sexual violence and sexual harassment.

We also aim to:

- Provide an environment where all children, irrespective of gender or orientation:
    - have positive relationships
    - have the confidence to talk to the adults they can trust
    - feel safe and secure
    - feel listened to.
- Raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse and of children in need.
- Ensure that through training all staff (teaching and support staff) will be able to recognise the signs of abuse and understand their responsibilities when a child may be at risk of harm.
- Ensure members of our school community:
    - understand their roles and responsibilities in all aspects of safeguarding

- understand safeguarding duties will impact upon all areas of the school's work.

1. Responsibilities, Training and Procedures

1.1: Staff Conduct

School staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

The Teachers' Standards (Dec 2021) states that teachers, including Heads, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the school community.

All staff should be aware of the dangers inherent in:

- Working alone with a child (e.g., a door should always be open or a clear view into the room maintained)
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to and receiving gifts from parents and children
- Contacting children through private telephones (including texting), emailing or social networking sites - (see E-safety Online Safety & Acceptable Use Policy)
- Disclosing personal details inappropriately
- Meeting pupils outside school hours or school duties

Please also refer to the safer working practice guidance - Guidance for Safer Working Practices

If any member of staff has reasonable suspicion that a child is suffering harm and fails to act in accordance with this policy and Westminster's Local Safeguarding Children Partnership procedures, we will view this as misconduct and take appropriate action.

1.2: Confidentiality and GDPR

Members of Staff and Governors may have access to confidential information about pupils in order to undertake their responsibilities. In some circumstances the information may be highly sensitive. Confidential or personal information about a pupil or her/his family must never be disclosed to anyone other than on a need-to-know basis.

In circumstances where the pupil's identity does not need to be disclosed, the information should be used anonymously. Information must never be used to intimidate, humiliate or embarrass the pupil.

There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay to those with designated child protection or safeguarding responsibilities.

Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security-protected school equipment. A record must be kept all school equipment that is taken off-site. Information must only be stored for the length of time necessary to discharge the task for which it is required.

If a member of staff is in any doubt about the storage or sharing of information, they must seek guidance from a senior member of staff. Any media or legal enquiries must be passed to Senior Management.

Everyone who deals with personal data shares the responsibility for data protection:

- The School must appoint a Data Protection Lead to be responsible for guiding the school on Data Protection matters.
- Senior Leaders who manage the 'data ecosystem' should be aware of the content of GDPR in order to oversee how the school is complying with data protection legislation.
- Staff who influence how data is used, processed and secured should be involved in creating high-level data maps and be aware of lawful reasons for processing data and minimising risks.
- All staff should be aware of what personal data is, how it can be used, and any risks involved.

1.3: Safer Recruitment Practices

In line with the guidance '[Keeping Children Safe in Education (KCSIE) (September 2026)]', our schools follow the guidance listed below:

- Governors and staff involved in recruitment adhere to safer recruitment practices.
- Job advertisements and application packs state clearly that the appointment will be subject to a satisfactory, enhanced DBS.
- All job descriptions and person specifications state the safeguarding responsibilities of the role.
- CVs are not accepted (unless the applicant has a disability preventing them from completing the application form).
- Two references for each candidate taken up and viewed by the chair prior to interview.
- One panel member has completed the Safer Recruitment training.
- Safer recruitment checklists completed, signed as seen & kept in the individual's personnel file.
- Candidates are checked using the Teacher Services system to carry out prohibition from teaching checks.

- There is a Single Central Record (SCR) of recruitment and vetting checks in place in line with statutory requirements.
- Volunteers are appropriately supervised.

1.4: Designated Safeguarding Lead (DSL)

Our Designated Safeguarding Lead and Deputy Designated Safeguarding Lead are fully trained and receive updated training every two years. The appointed DSL and Deputy DSL should be a senior member of staff, with appropriate status and authority to carry out the role.

Designated members of staff are responsible for adhering to the LA/LDBS Child Protection Procedures. All staff are responsible for informing the relevant designated lead of any concerns. The designated member of staff will keep records securely and up to date, in line with Keeping Children Safe in Education (KCSIE) (September 2026)

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

It is the responsibility of the designated member of staff to discuss concerns with Children's Services and Social Workers or other external services. If such concerns arise about the safety of a child, the child will be monitored closely, and any additional concerns will be passed on to the appropriate agencies. The designated member of staff will offer support and advice to other members of staff dealing with pupils.

If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Services or the Police.

1.5: Early Help

Our staff may identify children who may benefit from 'Early Help' as soon as a problem emerges at any point in a child's life and will refer with parental consent for support and contribute to agencies in preparing an Early Help assessment.

1.6: Process for Referring Pupils

- The concern is raised to the Designated Safeguarding Lead immediately in writing through an event log.
- The designated lead will consider the concern and decide the course of action.
- If necessary, the concern is passed to Children's Services.

1.7: Records of Child Protection and Safeguarding Concerns

Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils. This information may be shared with other agencies as appropriate.

Parental consent will be sought before making a Child in Need (S17 of the Children Act 1989) referral to Children's Services. If consent is withheld, consideration will be given to the potential impact of this for the child and to the need for a child protection referral (S47 of the Children Act 1989), which does not require parental consent.

The school will take into account the views and wishes of the child who is the subject of the concern, but staff will be alert to the dangers of colluding with dangerous "secrets".

Child Protection (CP) records are kept confidential and can only be accessed by appropriate professionals and agencies. CP records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Lead, their Deputy and the Senior Managers of the school.

Referrals made to Children's Services under the Westminster/LDBS procedures will be recorded on an Agency Referral form, with copies sent securely to Children's Services.

For further information on pupil records please see the Data Protection & Retention Policy.

1.8: Training for all Staff, Governors and Trustees

All staff members must receive regular refresher training, at least annually, to keep up to date with any relevant safeguarding and child protection developments.

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction, to equip them with the strategic knowledge to test and assure that robust whole school safeguarding policies and procedures are in place. This training should be regularly updated.

Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 12 for further information: KCSIE 2026) at induction. The training should be regularly updated. Induction and training should be in line with any advice from local safeguarding partners.

All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 12 for further information: KCSIE 2026 at induction. The training should be regularly updated.

In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

1.9: Induction Training

The DSL will ensure that all new staff and volunteers including teaching, non-teaching, support, supply, peripatetic, contract staff and third-party contractors (whose employees or subcontractors have access to school premises), governors, volunteers and trustees working in or on behalf of the school, are appropriately inducted with regards to the school's internal safeguarding procedures and communication lines.

1.10: Training of Designated Safeguarding Lead

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL's training will be updated formally every two years but may have refresher training at regular intervals, at least annually, to keep up with any developments relevant to their role.

1.11: Allegations against a member of staff

The school will follow the guidance set out in Keeping Children Safe in Education (KCSIE) (September 2026), Department of Education.

We understand that a child may make an allegation against a member of staff, including supply staff and volunteers. If such an allegation is made, the member of staff receiving the allegation should immediately inform the Head Teacher.

If the allegation is against the Head Teacher, the Chair of Governors must be notified. In all cases the Local Authority Designated Officer (LADO) at Westminster Council must be notified (020 76417668 or email lado@westminster.gov.uk) and an HR Advisor from either Westminster LA or LDBS.

Further advice can be obtained from the LADO for the local authority or Children's Services. In all cases it is the requirement to notify all allegations against staff to the LADO before commencing an internal investigation.

When an allegation is made against an individual, the Headteacher will assess whether the alleged person who works with children or the matter meets the following threshold (advice may be taken from Human Resources):

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

A member of staff could be subject to an allegation even if they have not harmed a child or intended to. It is enough that the member of staff's conduct could pose a risk to the child.

1.12: Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and the Senior Leadership Team will always take such concerns seriously.

All members of staff are made aware of the school's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Members of Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk

1.13: Single Central Record (SCR)

The school admin team is responsible for entering information onto the SCR. The Head Teacher and/or the DSL monitors the SCR monthly and completes a monitoring form. The Governing Body reviews a report on the SCR at least annually and Link Governors review the register at the school at least annually.

Westminster Local Authority carries out periodic audits. The Head Teacher is responsible for ensuring recommendations are acted upon swiftly. The Head Teacher will ensure the SCR meets Ofsted requirements.

2. Governors

- Governors are briefed and understand their roles and responsibilities regarding safeguarding and safer recruitment.
- Governors review the Safeguarding and Child Protection Policies annually.
- Governors ensure that independent companies to which activities are contracted have the required child protection procedures.
- In addition to an enhanced DBS check, all governors will be checked under Section 128 of the Education and Skills Act 2008 as a Section 128 direction disqualifies a person from holding or continuing to hold office as a governor of a maintained school.

2.1: Requirement to Read Guidance

All governors are required to read this policy and Keeping Children Safe in Education (KCSIE) (September 2026) and act according to the guidance given in both documents.

2.2: Designated Link Governor

The Governing Body has nominated a designated Governor (See Named Contacts, Appendix 1) who acts as link person between the Governing Body, Local Advisory Boards and the nominated Designated Safeguarding Lead. Governors will review the safeguarding procedures/practices including access to training through termly meetings with the Head Teacher.

3. Pupils

3.1: Teaching Pupils about Safeguarding

We believe that pupils should be provided with information that helps them protect themselves. Pupils are taught how to be safe through promoting safety online, personal, social, health and economic education.

Pupils will be educated at a level appropriate to their age and ability about a range of safeguarding concerns through personal, social, health and economic education (PSHE), tutorials (if appropriate) and through relationships and sex education (RSE). This will include, but is not limited to, bullying (including online bullying), radicalisation, child sexual exploitation (CSE), stranger danger, road safety, sexual abuse, neglect, online safety, gender-based violence/sexual assaults and 'sexting'.

3.2: Child-on-Child abuse (Managing allegations against other pupils)

All members of staff must recognise that children are capable of abusing their peers. Child-on-Child abuse can take many forms, including, but not limited to, bullying, cyberbullying, gender-based abuse, hazing (initiation type violence), sexually harmful behaviour and violence and 'sexting'.

The school is mindful that some potential issues may be affected by the gender, age, ability and culture of those involved.

Further information about the school's response to specific allegations of abuse against pupils can be located in the school's Behaviour Management, Anti-Bullying, and Online Safety Policies.

The school will take steps to minimise the risk of all forms of child-on-child abuse. We will ensure that appropriate curriculum time is dedicated to enabling children to develop an awareness and understanding of abusive behaviour and to ensure that children recognise warning signs and support both within the school and externally (such as the Police Community Liaison, Child Line etc.).

The school will respond to cases of "sexting" (or Youth Produced Sexual Imagery) in line with the UKCCIS "Sexting in Schools and Colleges" guidance and KSCB guidance.

3.3: Physical Contact and Restraint

Members of staff may have to make physical interventions with children. Members of staff should only do this where it is necessary to protect the child or another person from danger, and when the member of staff has received appropriate training.

3.4: Female Genital Mutilation (FGM)

Female Genital Mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.

We believe that all our pupils should be kept safe from harm. Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia, Sierra Leone and Nigeria. It is illegal in the United Kingdom to allow girls to undergo FGM either in this country or abroad. People guilty of allowing FGM to take place are punished by fines and up to fourteen years in prison.

It is a statutory duty for teachers, social workers and health-care professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. NB Staff should not examine pupils.

Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should consider and discuss any such case with the school's designated safeguarding lead and involve Children's Services as appropriate. FGM can also link to Honour Based Abuse (see KCSIE for further information).

Staff with teaching responsibilities have a specific legal duty to act with regards to concerns about FGM, but all staff should speak to the DSL where there are concerns.

Our Designated Safeguarding staff have received training on:

- Key Issues
- Risk factors
- High Risk Absences
- Symptoms
- Long term health problems

3.5: Preventing Radicalisation

In order for schools and childcare providers to fulfil the Prevent Duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified.

In order to protect children from the risk of radicalisation our school staff will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This may be through the form of influences in the home or activities out of school, visitors invited to the school and accessing websites or social media (online and offline) that promote radicalisation.

The Designated Safeguarding Lead should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme that focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

More information can be found in the The Prevent duty: safeguarding learners vulnerable to radicalisation (Sept 2023).

3.6a: Missing Children

All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude and any special educational needs they may have.

A child going missing from education is a potential indicator of abuse or neglect and therefore pupil attendance and absence is closely monitored in our school. The law requires all schools to have an admission and attendance register.

Our school will inform the Local Authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Please refer to the Keeping Children Safe in Education guidance.

3.6b: Children who are absent from Education (this is not the same as children absent from education)

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

3.7: Child Sexual Exploitation (CSE)

CSE is a form of abuse which involves children receiving something in exchange for sexual activity. CSE involves an imbalance of power in the relationship. It can involve varying degrees of coercion; intimidation or enticement, including unwanted pressure from peers to have sex; sexual bullying, including cyberbullying (online and offline) and grooming.

In addition to the behavioural indicators above, key indicators of CSE include appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; and having older boyfriends or girlfriends. Any concerns regarding CSE should be immediately reported to the DSL.

3.8: Grooming

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online and offline or in the real world by a stranger or by someone they know. Groomers may be male or female. They could be any age.

Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

3.9: Child Criminal Exploitation (CCE) including County Lines

CCE recognises the concern that exists with regard to children and young people who are used, through whatever means, to engage in criminal activity by other young people or adults who are able to coerce them to do so. The young people involved may not identify themselves as being 'exploited' as such, but it is clearly to their detriment that they are involved in this type of activity.

'County lines' – term used to describe the approach taken by gangs originating from large urban areas who use young people to travel to locations elsewhere, such as county and coastal towns, to sell class A drugs, and/or be couriers to move drugs and money between the new market and their urban hub.

'Contextual safeguarding' – is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

3.10: Photographing Children

We understand that parents/carers like to take photos of their children or video them in the school play, at sports day or school presentations. This is a normal part of family life and we do not discourage parents from celebrating their child's success.

However, there are restrictions on the use of images of children (e.g., data protection) and there may be health and safety considerations. We adhere to the following guidelines:

- We seek written parental consent for the use of photographs and images for use by the school (including the school website and brochures) when a child joins the school.

- If visitors come to the school to make videos or take photographs for use outside the school, we will seek specific parental consent.
- Staff should be sensitive to the feelings of pupils who may be uncomfortable about being photographed.
- Staff should be aware of the use of flash photography and the impact it may have on some of our pupils.
- Children's full names are not used in our publications.
- Personal devices, including mobile phones, must not be used to photograph children. Only the school's equipment may be used.

3.11: Parents taking photos of school events

Parents are permitted to take photographs of their children at school events. The photograph should focus on their child and should not be uploaded to social media sites.

Please see the Information Commissioner's Office advice on taking photographs.

3.12: Children with Education Health & Care Plan (EHCP)

We recognise that, statistically, children with behavioural difficulties and disabilities (SEND) are most vulnerable to abuse and can face additional safeguarding challenges both online and offline.

All members of staff who support these pupils will be made aware of the need for vigilance for the signs of abuse and that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours or the consequences of doing so.

Reports of abuse involving this identified group will require close liaison with the DSL or Deputy DSL and the SENCO. The school will also consider extra pastoral support and attention, and ensure that appropriate support for communication is in place.

Furthermore, the school has a responsibility to pay heed to the Equality Act 2010 and children with SEN and disabilities when excluding students.

3.13: Children with Court Orders in place

A meeting with the parent/s will be held for any child subject to a court order. During this meeting, the school will clarify all instructions around the content of the order that is specifically related to the collection, drop-off and sharing of school information for the child, including emergency contact details. This will be recorded and signed by both parents.

3.14: Online Safety & Social Media

The school has a separate policy on Internet Use and Online Safety. Please refer to the Online Safety & Acceptable Use Policy.

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs. Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

3.15: Transporting Pupils

In certain situations, e.g., out of school activities, staff, volunteers or governors may agree to transport pupils. Wherever possible, any transport arrangements should be made in advance by a designated member of staff. Any transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort in agreement with parents.

Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.

3.16: Before and After School Activities and Educational Visits

Staff and volunteers should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Educational risk assessments must be carried out on all off-site activities.

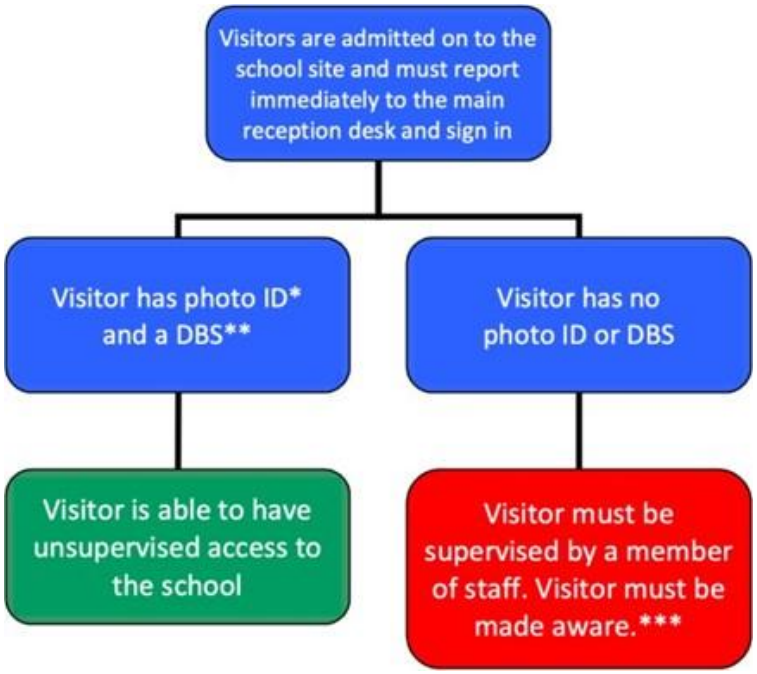
Staff and volunteers remain in a position of trust and the same standards of conduct apply as if they were in school.

4. Site Safety

- Risk assessments are carried out regularly and communicated to pupils and staff.
- There is a designated Health and Safety link member on the Governing Body.
- There is a RIDDOR reportable accident book with evidence of action taken and impact of action. All other first aid incident reports are kept in a medical folder.
- All members of staff are aware of their responsibilities to report Health and Safety concerns to the Site Manager immediately.
- Windows should not be blocked or covered, and fire doors should be kept closed at all times (unless overridden another risk assessment i.e., COVID and ventilation of classrooms).

4.1: Visitors to the School

The procedure is as follows:



* Valid photo ID, Driving Licence or passport, Westminster Education /NHS/Westminster City Council photo ID badge.

** Schools should have a copy of a letter from i.e. Westminster Education/LDBS to confirm that employees are DBS checked.

*** If a visitor does not have the relevant ID/checks they must wait until a suitable member of staff is available to supervise access.

All visitors must sign into the visitor book. The member of staff signing the visitor in must mark the badge clearly with a large 'S' to show that the visitor must be supervised.

It is everyone's responsibility to politely challenge anyone without the correct identification.

The following queries often arise:

What do I need for supply agency staff?

You need written confirmation that appropriate checks, including DBS checks have been carried out and by whom (most commonly the relevant HR department). A letter or copy of a contract that states that an agency or contractor has carried out all appropriate checks, including DBS checks is sufficient.

4.2: Agency Staff:

The school does not employ them so should they be included on the SCR?

Yes, contracted staff that come into regular contact with children such as cleaning, caretaking and kitchen staff should be included on the single central record but, as for supply staff, written assurances provided by the employing organisation are sufficient proof that the relevant checks have been undertaken.

SCHOOLS DO NOT NEED TO COMPLETE A DBS SEPARATELY FOR THESE PEOPLE.

4.3: Peripatetic and Specialist Staff (including sports coaches):

Do schools need to ask social workers, EP's, sports coaches and inspectors for a copy of their DBS clearance?

No. Staff in this group will have been DBS checked by their organisation (i.e. Supply Agency, LDBS, LA, etc) and will provide photographic identification. If the school has received email (written) assurances that key LA staff such as social workers have been checked then that is enough. Proof of appropriate checks is most often provided by way of a photo – identity badge (similar to those carried by HMI and other inspectors).

4.4: Should We Keep Documents Evidencing Identity?

No. Schools do not have to keep documents evidencing identity, once these have been verified and the single central record includes the name of the person who did so.

5. Links to other policies

This policy has been written in consideration of the Keeping Children Safe in Education (KCSIE) (September 2026). It should also be read alongside Working Together to Safeguard Children which applies to all schools.

The following policies are linked to this policy:

- Health and Safety Policy
- Positive Handling Policy

- Behaviour Policy
- Attendance & Punctuality Policy
- Relationships, Sex & Health Education Policy
- SEND Policy
- Whistleblowing Policy
- Data Protection & Retention Policy
- Equalities Policy
- Online Safety and Acceptable Use Policy