



"Live, Love and Learn together in the Light of the Life of Christ"

St Mary's C E Primary School

Safeguarding and Child Protection Policy

2026–2027

This policy will be reviewed at least annually and whenever changes to legislation, statutory guidance, local safeguarding arrangements or school circumstances require it.

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1. Safeguarding Policy Statement

At St Mary's C.E. Primary School, safeguarding is at the centre of everything we do. Safeguarding and promoting the welfare of children is everyone's responsibility.

We adopt a whole-school, child-centred approach in which the best interests of the child are considered at all times. We are committed to ensuring that children feel safe, valued and able to express their views, wishes and feelings. We actively encourage pupils to speak with trusted adults and ensure that their voices are heard and taken into account when decisions are made about them.

We recognise that no single practitioner can have a complete picture of a child's needs and circumstances. Effective safeguarding therefore depends on staff identifying concerns early, sharing information appropriately and working collaboratively with children, families and other agencies so that children receive the right help at the right time.

Every child has the right to learn in a safe, secure and supportive environment. We work to build strong and respectful relationships with pupils, staff, parents, carers and partner agencies, recognising that effective partnership working is central to safeguarding.

This policy applies to all staff, including temporary and supply staff, trainee teachers, volunteers, governors, contractors and anyone working in or on behalf of St Mary's C.E. Primary School.

Our safeguarding responsibilities are informed by relevant legislation and statutory guidance, including *Keeping Children Safe in Education 2026* and *Working Together to Safeguard Children 2026*.

We recognise the importance of providing help and support as soon as problems emerge. Children and families may receive support through universal services and community-based Early Help, targeted early help through Family Help, or statutory services where required.

Where it is safe and, in the child's best interests, we will work in partnership with parents, carers and family networks. However, the welfare and safety of the child are paramount. Information may be shared without consent where this is necessary and proportionate to safeguard a child or others.

When children feel safe, listened to and supported, they are better able to engage in learning, develop positive relationships and achieve good outcomes.

2. Important Safeguarding Contacts

School Contacts

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Emilia Pacetta	safeguarding@stmarysce.brent.sch.uk / 020 8451 0363 ext. 104
Deputy Designated Safeguarding Lead (DDSL)	Rochelle Sylvester	safeguarding@stmarysce.brent.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	Jadene Guiste	safeguarding@stmarysce.brent.sch.uk
Headteacher	Rochelle Sylvester	safeguarding@stmarysce.brent.sch.uk
Special Educational Needs Coordinator (SENCO)	Emilia Pacetta	safeguarding@stmarysce.brent.sch.uk
Chair of Governors	Fr Dumaeza Nhlapo	fr.dumaeza@gmail.com
	Sandra Kitchen	sandra.kitchen@btinternet.com
Safeguarding Link Governor	Jamie Redfarn	jredfarn@outlook.com

Any safeguarding concern about the conduct of an adult working in or on behalf of the school must be reported to the Headteacher without delay.

Where the concern relates to the Headteacher, it must be reported to the Chair of Governors.

Where there is an immediate risk of harm to a child, appropriate action must not be delayed while waiting for a DSL or senior leader to become available.

External Safeguarding Contacts

Organisation / Role	Contact details
Brent Local Authority Designated Officer (LADO)	Duty LADO: 020 8937 4300 – Option 1

Organisation / Role	Contact details
Brent Family Front Door / Children's Social Care	020 8937 4300
Police	Emergency: 999 / Non-emergency: 101
NSPCC Helpline	0808 800 5000 / help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285
ACT Early / Prevent advice for members of the public	0800 011 3764
Prevent / Channel professional advice	020 8937 4300/ prevent@brent.gov.uk

The school will follow current Brent Safeguarding Children Partnership procedures and referral routes.

3. Legislation and Statutory Guidance

This Safeguarding and Child Protection Policy is underpinned by relevant legislation and statutory guidance.

Primary Legislation

Education Act 2002, Section 175/

Places a duty on maintained schools and local authorities to make arrangements to safeguard and promote the welfare of children.

Children Act 1989 and Children Act 2004

Provide the principal legislative framework for safeguarding and promoting the welfare of children, including duties relating to children in need, child protection and multi-agency cooperation.

Domestic Abuse Act 2021

Recognises children as victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse.

Female Genital Mutilation Act 2003 and Serious Crime Act 2015

Provide the legal framework relating to Female Genital Mutilation (FGM), including the mandatory reporting duty on teachers where they discover that FGM appears to have been carried out on a girl under the age of 18.

Counter-Terrorism and Security Act 2015

Places a duty on specified authorities, including schools, to have due regard to the need to prevent people from being drawn into terrorism.

Safeguarding Vulnerable Groups Act 2006

Provides the legislative framework for regulated activity relating to children and barring arrangements.

Crime and Policing Act 2026

Introduces changes relevant to regulated activity with children, including the removal of the previous supervision exemption. The school will ensure that safer recruitment and DBS arrangements reflect current statutory requirements.

Rehabilitation of Offenders Act 1974, as amended

Sets out circumstances in which criminal convictions and cautions must be disclosed or may be considered when assessing suitability to work with children.

Equality Act 2010

Protects individuals from unlawful discrimination and requires schools to make reasonable adjustments and take appropriate action to prevent disadvantage and discrimination.

Human Rights Act 1998

Protects fundamental rights and freedoms, including children's rights to safety, dignity, privacy and protection from inhuman or degrading treatment.

Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025

Together these form the principal data protection framework governing how personal information is processed, stored and shared. Data protection law does not prevent the lawful and proportionate sharing of information for safeguarding purposes.

Childcare Act 2006 and Childcare (Disqualification) Regulations 2018

Set out safeguarding requirements relating to early years provision and disqualification from childcare.

Statutory Guidance

The school will have regard to and comply with all applicable statutory guidance, including:

- *Keeping Children Safe in Education 2026*
- *Working Together to Safeguard Children 2026*
- *Prevent Duty Guidance*
- current statutory and departmental guidance on information sharing for safeguarding purposes
- *Multi-agency Statutory Guidance on Female Genital Mutilation*

- the current *Early Years Foundation Stage Statutory Framework*
- relevant statutory guidance on children missing education, attendance and alternative provision.

Keeping Children Safe in Education 2026 is the statutory safeguarding guidance for schools and colleges in England. All staff are required to read Part One. The DfE's optional Part One overview may be used as an additional quick-reference resource but does not replace the requirement to read Part One in full.

Local Safeguarding Arrangements

St Mary's C.E. Primary School works in accordance with the procedures and expectations of the Brent Safeguarding Children Partnership and Brent Children's Services.

This includes local procedures relating to:

- safeguarding referrals
- Family Help and statutory children's social care
- thresholds and criteria for intervention
- escalation and professional challenge
- allegations against adults and referrals to the Local Authority Designated Officer
- children missing or absent from education
- exploitation and extra-familial harm
- Prevent and Channel referrals
- multi-agency safeguarding practice.

The school will ensure that staff are familiar with the most current local referral pathways, thresholds and contact arrangements.

Additional Relevant Guidance and Standards

The school will also have regard to:

- School Staffing (England) Regulations 2009, as amended
- current DfE safer recruitment and regulated activity guidance
- DfE Filtering and Monitoring Standards for Schools and Colleges
- current maintained-school governance guidance
- *What to do if you're worried a child is being abused: advice for practitioners*
- current DfE guidance relating to online safety and the use of technology in schools.

4. Definitions: Safeguarding, Family Help and Child Protection

Family Help and Support

Children and families may require different levels of help and support at different times. Staff should be alert to emerging needs and act early rather than waiting for difficulties to escalate.

Where a member of staff believes that a child or family may benefit from additional support, they must discuss this with the Designated Safeguarding Lead (DSL) or a Deputy DSL.

The DSL will consider the appropriate level of support in accordance with Brent's local assessment criteria, thresholds and referral pathways. This may include:

- support through universal or community services
- community-based Early Help
- targeted early help through Family Help
- statutory support under Section 17 of the Children Act 1989
- child protection intervention under Section 47 of the Children Act 1989.

Plans will be monitored and reviewed. Where concerns increase, support is ineffective or the child's circumstances deteriorate, the response must be escalated appropriately.

The provision of Early Help or Family Help must never delay a referral to Children's Social Care where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Child in Need — Section 17 Children Act 1989

Under Section 17 of the Children Act 1989, a child may be considered a Child in Need where:

- they are unlikely to achieve or maintain a reasonable standard of health or development without the provision of services
- their health or development is likely to be significantly impaired without such services; or
- they are disabled.

The local authority has responsibility for assessing the child's needs and determining what services should be provided. The school will contribute to assessments, plans and reviews and will share relevant information appropriately.

Child Protection — Section 47 Children Act 1989

Child protection forms part of safeguarding and applies where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Where this threshold may be met, Children's Social Care has a duty to make enquiries to determine what action is required.

St Mary's will:

- make referrals without unnecessary delay
- cooperate fully with Children's Social Care, Police and other statutory partners
- share relevant safeguarding information
- contribute to assessments, strategy discussions, conferences and plans where required
- continue to support and safeguard the child while statutory processes are taking place.

If a child is in immediate danger or at risk of immediate serious harm, a referral must be made to Children's Social Care and/or the Police immediately.

Any member of staff may make a referral directly if necessary. Staff should inform the DSL as soon as practicable that they have done so.

Significant Harm

Significant harm is the threshold used to determine when compulsory intervention may be necessary to protect a child.

Harm may include:

- ill-treatment, including sexual abuse and forms of ill-treatment that are not physical
- impairment of physical or mental health
- impairment of physical, intellectual, emotional, social or behavioural development.

Children may also suffer harm as a result of seeing, hearing or experiencing the effects of the ill-treatment of another person, including domestic abuse.

The impact on the individual child, their age, development, vulnerability, circumstances and cumulative experiences will be considered when assessing harm.

Abuse, Neglect and Exploitation

Abuse, neglect and exploitation are forms of maltreatment.

A child may be harmed by:

- an adult
- another child or children
- a family member
- a person known to them
- a stranger
- an individual or group exploiting them

- behaviour occurring online or facilitated through technology.

Harm may occur inside or outside the family home and may take place online and offline simultaneously.

Safeguarding concerns rarely occur in isolation. Staff must consider the child's circumstances as a whole and remain professionally curious where several apparently minor concerns form a pattern.

The four main categories of abuse are:

- physical abuse
- emotional abuse
- sexual abuse
- neglect.

Exploitation may overlap with any of these forms of harm.

More detailed information about indicators and specific safeguarding issues is provided later in this policy.

Extra-Familial Harm and Exploitation

Children may experience significant harm in contexts outside their family or home.

Extra-familial harm may include:

- child sexual exploitation
- child criminal exploitation
- county lines
- serious violence
- harmful behaviour between children
- sexual violence and sexual harassment
- trafficking and modern slavery
- exploitation by groups or organised networks
- radicalisation
- online abuse and exploitation.

Staff must recognise that children who are being exploited may not identify themselves as victims and may appear to cooperate with, defend or feel loyalty towards those exploiting them.

A child's apparent agreement or participation does not mean that they are not being exploited. Exploitation may be committed or facilitated by an individual, group, gang or organised network. A child may identify with, feel loyalty towards or regard themselves as part of the group exploiting them.

Where extra-familial harm is suspected, staff will consider not only the individual child but also the wider contexts, locations, peer groups, online environments and relationships in which harm may be occurring.

5. Equality, Inclusion and Children Who May Be at Greater Risk of Harm

St Mary's C.E. Primary School is committed to safeguarding all children and to creating an inclusive, respectful and anti-discriminatory culture.

Safeguarding practice will reflect the requirements of the Equality Act 2010 and the Human Rights Act 1998. Staff must be alert to the possibility that prejudice, discrimination, racism, sexism, homophobia, biphobia, disability discrimination and other forms of discrimination may themselves cause harm or increase a child's vulnerability to abuse, bullying or exploitation.

Children's experiences of harm may be affected by their:

- disability or special educational needs
- sex
- race or ethnicity
- religion or belief
- sexual orientation
- family circumstances
- communication needs
- social or economic circumstances
- experiences of discrimination or marginalisation.

Children should never receive a lower standard of safeguarding response because of assumptions about their background, behaviour, disability, communication, culture, family or identity.

Staff will listen to children carefully, take their concerns seriously and make reasonable adjustments where necessary to enable children to communicate and participate in safeguarding decisions.

Prejudice-Based Harm

Children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health and willingness to seek help.

Staff must take prejudice-based concerns seriously and consider whether discriminatory behaviour, bullying or harassment forms part of a wider safeguarding concern. Concerns will be recorded and responded to in accordance with the school's safeguarding and behaviour procedures.

Children Who May Benefit from Additional Help or Protection

Staff should be particularly alert to children who:

- have special educational needs or disabilities
- have medical conditions or significant health needs
- have mental health needs
- are young carers
- have a social worker or have previously had a social worker
- are looked after or previously looked after
- live in kinship care arrangements
- are absent from education repeatedly or for prolonged periods
- live in temporary accommodation or experience housing instability
- are missing from education
- are at risk of suspension or permanent exclusion
- attend alternative provision
- are educated at home
- are experiencing domestic abuse
- live with parental substance misuse or parental mental ill health
- are affected by parental offending or imprisonment
- are at risk of criminal or sexual exploitation
- are affected by serious violence, gangs or county lines
- may be victims of trafficking or modern slavery
- are at risk of radicalisation
- are at risk of so-called honour-based abuse, including Female Genital Mutilation or forced marriage
- are privately fostered
- experience discrimination, bullying or harassment
- are pregnant and/or are parents themselves
- have exhibited early signs of abusive, violent or harmful behaviour
- have been repeatedly removed from the classroom, experienced multiple suspensions or are on a part-time timetable
- misuse alcohol or other drugs themselves.

This list is not exhaustive. Vulnerability should never be considered as a fixed characteristic of a child. A child's circumstances, relationships and environment may change, and staff must remain alert to emerging risks.

Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities may face additional safeguarding challenges and may experience increased vulnerability to abuse, neglect and exploitation.

Additional barriers may include:

- assumptions that behaviour, injuries, distress or changes in presentation are related to a child's disability or SEND rather than possible abuse
- communication difficulties which may affect a child's ability to disclose or describe what has happened
- difficulty recognising unsafe situations or behaviour
- increased dependence on adults for care, personal support or communication
- greater risk of isolation, bullying or exploitation
- difficulties accessing safeguarding education in a form they understand
- limited participation in decision-making or reduced autonomy
- difficulties understanding online risk
- professionals focusing primarily on the child's additional needs or the pressures experienced by the family and failing to recognise safeguarding concerns.

Staff must avoid diagnostic overshadowing and maintain professional curiosity.

Reasonable adjustments, communication aids, visual support, trusted adults and other appropriate methods will be used to ensure that children with SEND are able to communicate their wishes and feelings and participate as fully as possible in decisions affecting them.

Where safeguarding concerns involve a child with SEND, the DSL will ensure that the child's special educational needs, communication profile and required reasonable adjustments are fully considered as part of the safeguarding response.

Children with Medical Conditions

Children with medical conditions may have additional safeguarding vulnerabilities, particularly where they:

- depend on adults for medication, treatment or intimate/personal care
- have frequent absences from school
- experience communication difficulties
- are socially isolated

- require support from several professionals or services.

Staff must not automatically attribute changes in presentation, behaviour, attendance, injuries or distress to a child's medical condition.

Failure to provide necessary medical care or deliberately preventing a child from receiving appropriate healthcare may constitute neglect or another safeguarding concern.

Young Carers

A young carer is a child who provides, or intends to provide, care for another person.

Young carers may experience additional pressures affecting their education, attendance, emotional wellbeing and development. Staff should be alert to children taking on caring responsibilities which are excessive or inappropriate for their age, or which are adversely affecting them.

Where a young carer appears to require additional support, the school will consider Family Help and other appropriate services and will work with the child and family to identify suitable support.

Children Looked After and Previously Looked After

Children who are looked after, and children who have previously been looked after, may have experienced abuse, neglect, loss, instability or trauma and can face additional safeguarding challenges.

The school will ensure that:

- an appropriately trained Designated Teacher is appointed to promote the educational achievement of looked-after and previously looked-after children
- the DSL has details of the child's social worker and the name of the Virtual School Head where applicable
- relevant staff understand the child's care arrangements and legal status where they need this information to safeguard and support the child
- safeguarding, educational and pastoral information is shared appropriately
- the child's Personal Education Plan is used effectively
- attendance, wellbeing, progress and any emerging safeguarding concerns are monitored.

The school will work closely with carers, social workers, the Virtual School and other professionals to promote stability, safety and positive outcomes.

Children with a Social Worker

Children who have or have previously had a social worker may face barriers to attendance, learning and wellbeing as a result of experiences of adversity, abuse, neglect or family difficulties.

The DSL will work with relevant staff and external professionals to ensure that information about a child's circumstances informs decisions about:

- safeguarding
- attendance
- pastoral support
- academic support
- behaviour
- reasonable adjustments and additional provision.

Information will be shared only with staff who need it in order to safeguard and support the child.

The school recognises the strategic role of the Virtual School Head in promoting improved educational outcomes for children with a social worker and will seek advice and support where appropriate.

Children in Kinship Care

Kinship care describes arrangements in which a child is cared for by a relative, friend or other person with a prior connection to the child.

Arrangements may include:

- informal kinship care
- kinship foster care
- Special Guardianship Orders
- Child Arrangements Orders
- other family and friends care arrangements.

Children living in kinship care may have experienced loss, trauma, abuse, neglect or disruption before the arrangement began. Staff will avoid assumptions that placement with family or friends removes safeguarding vulnerability.

The school will work sensitively with the child, carers and relevant professionals and will seek advice from the Virtual School where appropriate.

Children Absent or Missing from Education

Repeated or prolonged absence from education can be a warning sign of safeguarding concerns, including:

- neglect
- abuse
- exploitation
- criminal or sexual exploitation

- domestic abuse
- mental health difficulties
- forced marriage
- travelling to conflict zones
- radicalisation.

Staff must be alert not only to children who are formally classified as Children Missing Education but also to patterns of repeated or prolonged absence.

Concerns will be addressed in accordance with the school's attendance procedures and safeguarding processes. Safeguarding concerns must not be treated solely as attendance matters.

Children Living in Temporary Accommodation

Children placed in temporary accommodation may experience disruption, instability, increased travel, changes in attendance and reduced access to services. Where the school receives a temporary-accommodation notification, the DSL will ensure that the information is recorded, relevant safeguarding and educational needs are considered, and appropriate support is coordinated with the child, family and relevant agencies.

Elective Home Education

Where a parent indicates an intention to remove a child from school for Elective Home Education, the school will consider whether there are any existing or emerging safeguarding concerns.

Where appropriate, the DSL will share relevant information with the Local Authority in accordance with safeguarding and information-sharing requirements.

The school recognises that Elective Home Education is not in itself a safeguarding concern. However, where safeguarding concerns already exist, removing a child from school may reduce opportunities for professionals to observe and support them.

Alternative Provision

Where St Mary's commissions alternative provision for a pupil, responsibility for safeguarding that child remains with the school. The school will always know where a pupil placed in alternative provision is based during school hours. Records will include the address of the provider and details of any subcontracted provision or satellite sites the pupil may attend. Each placement will be reviewed at least half-termly to provide assurance that it remains safe, suitable and appropriate to the pupil's individual needs.

Before a placement begins, the school will assure itself that safeguarding arrangements at the provision are appropriate and that relevant checks have been completed.

The school will:

- maintain regular contact with the pupil and provider
- monitor attendance, welfare and progress
- share relevant safeguarding information
- respond promptly to unexplained absence or emerging concerns
- review whether the placement remains safe and appropriate.

Placement in alternative provision does not reduce the school's safeguarding responsibilities towards the child.

Lesbian, Gay or Bisexual Children and Children Questioning Their Gender

Children who are lesbian, gay or bisexual, or who are questioning their sexual orientation or gender, may be vulnerable to bullying, abuse, harassment or discrimination.

Staff will provide a safe and supportive environment in which children can speak to a trusted adult.

Safeguarding decisions will:

- focus on the individual child's safety, welfare and best interests
- avoid assumptions about a child's identity
- respond appropriately to bullying, harassment or discrimination
- take account of the child's age and developmental understanding
- be made in accordance with current law and statutory guidance
- involve parents and carers in accordance with current statutory guidance, unless doing so would create or increase a safeguarding risk.

The school will not tolerate homophobic, biphobic or other discriminatory abuse.

Sport, Toilets and Changing Facilities

The school will ensure that arrangements for sport, physical education, toilets, washing and changing facilities comply with current safeguarding guidance, the Equality Act 2010 and the School Premises (England) Regulations 2012.

Where participation in a sport or activity is separated by sex because physical differences may affect safety or fair competition, decisions will be made in accordance with current statutory guidance. Pupils will not be permitted to use toilets or changing facilities designated for the opposite sex.

Any individual safeguarding, privacy or dignity needs will be considered sensitively, proportionately and in the best interests of all children affected.

Whole-School Safeguarding Responsibility and Preventative Education

Safeguarding is everyone's responsibility at St Mary's C.E. Primary School.

This policy applies to all permanent and temporary staff, supply staff, trainee teachers, volunteers, governors, contractors and other adults working in or on behalf of the school. It also applies to safeguarding arrangements connected with extended-school provision, trips, educational visits, alternative provision and other off-site activities.

The school adopts a whole-school approach in which safeguarding is embedded throughout policy, curriculum, pastoral systems, staff conduct and everyday practice.

We aim to create a culture characterised by:

- respect
- inclusion
- safety
- equality
- appropriate professional boundaries
- openness about safeguarding concerns
- confidence that concerns will be listened to and acted upon.

We will challenge discrimination, prejudice, sexual harassment, harmful sexual behaviour and other inappropriate behaviour rather than dismissing it as banter, joking or part of growing up.

Preventative Education

St Mary's recognises that education is an important part of safeguarding.

Through Relationships, Sex and Health Education, Computing, the wider curriculum, assemblies and pastoral provision, children are taught in an age-appropriate way about:

- healthy and respectful relationships
- appropriate and inappropriate behaviour
- personal boundaries
- consent
- privacy
- recognising unsafe situations
- bullying and discrimination
- online safety
- exploitation and grooming
- the safe use of technology
- how and where to seek help

- the importance of telling a trusted adult when something feels wrong or unsafe.

Teaching will be adapted so that children with SEND and communication needs can access and understand safeguarding education.

Preventative education will form part of a planned, coherent curriculum rather than relying solely on responses to incidents.

6. Roles and Responsibilities of Staff, Leaders and Governors

Responsibilities of All Staff

Safeguarding and promoting the welfare of children is everyone's responsibility.

All staff must maintain an attitude of **“it could happen here”** and must act in the best interests of the child.

All staff must:

- read and understand Part One of *Keeping Children Safe in Education 2026*
- confirm that they have read and understood the school's safeguarding and child protection policy and relevant safeguarding procedures
- undertake appropriate safeguarding and child protection training, including online safety, at induction and receive regular updates thereafter
- understand the school's systems for identifying, recording and reporting safeguarding concerns
- know the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs
- be alert to signs of abuse, neglect and exploitation
- understand that safeguarding concerns may arise inside or outside the home and may occur online and offline
- recognise that children may experience more than one form of harm at the same time
- be prepared to identify children and families who may benefit from Family Help
- understand the local criteria and routes for Family Help and statutory Children's Social Care intervention
- understand the particular safeguarding vulnerabilities of some children, including children with SEND, medical needs or communication difficulties
- recognise patterns of repeated or prolonged absence from education as a possible safeguarding indicator
- know how to respond appropriately when a child makes a disclosure
- record concerns accurately, factually and promptly

- report safeguarding concerns without delay
- never promise a child confidentiality
- reassure children that they are being taken seriously and will be supported
- contribute to an environment in which children feel safe to speak to trusted adults.

All staff must understand that **they should not assume that somebody else will take action or share information that may be critical to keeping a child safe.**

Where a member of staff has a concern about a child, they should normally report it to the DSL or a Deputy DSL immediately.

If, in exceptional circumstances, the DSL or a Deputy DSL is unavailable, this must not delay appropriate action. Staff should speak to a member of the senior leadership team and/or seek advice directly from Children's Social Care.

Any member of staff may make a referral directly to Children's Social Care where necessary. The DSL should be informed as soon as practicable.

Safeguarding Concerns About Adults

All staff must know how to report concerns about an adult working in or on behalf of the school.

Any safeguarding concern, however small, about the behaviour or conduct of an adult working with children must be reported in accordance with the school's procedures.

Concerns about a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working on behalf of the school must be reported to the Headteacher.

Concerns about the Headteacher must be reported to the Chair of Governors.

Staff must also know how to use the school's whistleblowing procedures where they have concerns about safeguarding practice or believe that concerns are not being dealt with appropriately.

Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead is an appropriate senior member of the school's leadership team and has lead responsibility for safeguarding and child protection.

This includes responsibility for:

- online safety
- understanding the school's filtering and monitoring systems and processes
- providing safeguarding advice and support to staff
- managing and coordinating safeguarding referrals

- working with Children's Social Care, Police, health services and other safeguarding partners
- coordinating the school's contribution to Family Help and statutory safeguarding processes
- maintaining and overseeing safeguarding and child protection records
- ensuring appropriate information is shared within the school and with external agencies
- monitoring safeguarding patterns, trends and emerging risks
- promoting the educational outcomes of children who have experienced or are experiencing safeguarding concerns
- ensuring that the voices, wishes and feelings of children are understood and considered
- ensuring that safeguarding practice takes account of children's SEND, communication needs and required reasonable adjustments
- raising awareness of safeguarding throughout the school.

The DSL will ensure that safeguarding concerns involving a child with SEND take full account of the child's special educational needs, communication profile and required reasonable adjustments.

Where appropriate, relevant staff and external professionals will be consulted to ensure that safeguarding decisions take account of the child's needs and circumstances.

Managing Referrals

The DSL is expected to refer cases, as appropriate, to:

- Local Authority Children's Social Care
- the Police where a crime may have been committed
- the Channel programme where there are concerns about radicalisation
- the Disclosure and Barring Service where the relevant criteria are met
- the Local Authority Designated Officer where concerns or allegations about adults meet or may meet the relevant threshold.

The DSL will support and advise staff who make referrals themselves.

Working With Others

The DSL will:

- act as a source of safeguarding advice and expertise for staff
- act as a point of contact with safeguarding partners
- liaise with the Headteacher on safeguarding matters

- contribute to assessments, strategy discussions, child protection conferences and other multi-agency meetings
- support other staff to contribute appropriately to these processes
- work with Children's Social Care and other services to promote the welfare and protection of children
- work with relevant staff to ensure appropriate support for children who have experienced safeguarding concerns
- understand Brent's local safeguarding arrangements, thresholds and escalation procedures.

Deputy Designated Safeguarding Leads

Deputy DSLs will be trained to the same standard as the DSL.

Safeguarding activities may be delegated to appropriately trained Deputy DSLs, but **ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.**

Availability and Continuity

During term time, the DSL or a Deputy DSL will always be available during school hours for staff to discuss safeguarding concerns.

The school will maintain clear and reliable arrangements for periods when the DSL is unavailable because of absence, illness, training or other circumstances.

These arrangements may include use of the school's confidential safeguarding email account, provided that it is monitored and concerns are acted upon without delay.

Appropriate safeguarding cover will also be considered for school activities taking place outside normal school hours or during school holidays.

Role of the Governing Body

The Governing Body has strategic leadership responsibility for the school's safeguarding arrangements.

The Governing Body will ensure that:

- the school complies with its statutory safeguarding duties
- safeguarding policies, procedures and practice are effective
- the school adopts a whole-school approach to safeguarding
- safeguarding and child protection arrangements reflect *Keeping Children Safe in Education 2026*, *Working Together to Safeguard Children 2026* and local safeguarding arrangements
- a senior board-level lead takes leadership responsibility for safeguarding arrangements

- an appropriately trained safeguarding link governor is appointed
- the DSL has the appropriate status, authority, skills and experience to undertake the role
- the DSL is provided with sufficient time, funding, training, resources and support
- all staff receive appropriate safeguarding and child protection training
- all governors receive appropriate safeguarding and child protection training, including online safety, at induction and that this training is updated regularly
- effective filtering and monitoring arrangements are in place and subject to appropriate oversight and review
- procedures are in place for managing safeguarding concerns and allegations about adults, including low-level concerns
- safer recruitment procedures are followed
- safeguarding arrangements relating to contractors, visitors, third-party providers, alternative provision and use of school premises are effective
- appropriate action is taken to safeguard children who may be at greater risk of harm
- safeguarding is considered when policies and decisions are reviewed.

Recruitment, vetting, DBS, regulated activity and Single Central Record arrangements are set out in the school's Safer Recruitment Policy. These arrangements reflect Part Three of KCSIE 2026, including the removal of the previous supervision exemption from regulated activity and the requirements applying to volunteers, contractors, self-employed individuals and adults supervising work experience.

Governor safeguarding training will enable governors to provide strategic challenge and to test and assure themselves that the school's safeguarding arrangements are effective.

The Governing Body will receive safeguarding information sufficient to provide effective oversight and challenge while maintaining appropriate confidentiality.

The Chair of Governors will act as case manager where a safeguarding concern or allegation relates to the Headteacher.

Role of the Headteacher

The Headteacher is responsible for ensuring that the safeguarding policies and procedures adopted by the Governing Body are implemented effectively and understood by all staff.

The Headteacher will ensure that:

- all staff receive appropriate safeguarding induction, training and updates
- all staff understand the school's safeguarding procedures

- concerns about children are reported and acted upon appropriately
- the safeguarding policy is made available to parents, carers and the wider school community
- the DSL is given sufficient time, authority, resources and support to fulfil the role effectively
- appropriate arrangements are maintained for safeguarding during periods when key safeguarding staff are absent
- safer recruitment and staffing procedures are followed
- allegations and low-level concerns about adults are managed in accordance with statutory and local procedures
- safeguarding is embedded across school practice
- safeguarding arrangements are monitored, reviewed and improved.

The Headteacher will normally act as Case Manager. Where the concern or allegation relates to the Headteacher, the Chair of Governors will act as Case Manager.

7. Family Help and Support

St Mary's C.E. Primary School recognises the importance of providing children and families with the right help at the right time.

Children and families should not be left waiting for support when difficulties emerge.

Our approach reflects *Working Together to Safeguard Children 2026*, which describes support through:

- universal services and community-based Early Help
- targeted early help delivered through Family Help
- statutory services under Section 17 of the Children Act 1989
- child protection intervention under Section 47 of the Children Act 1989 where there is reasonable cause to suspect significant harm.

Family Help

Family Help brings together targeted early help and statutory support under Section 17 so that children and families can receive more coordinated support and, where possible, experience consistent relationships with practitioners.

Family Help is a voluntary approach and requires the family's consent to receive the relevant support and services.

Staff should be prepared to identify children and families who may benefit from Family Help.

The school will work in accordance with Brent's published local criteria, thresholds and referral arrangements.

Where Family Help is appropriate, the school may:

- contribute to a Family Help assessment
- contribute to the development and review of a Family Help plan
- attend multi-agency meetings
- share relevant information with partner agencies
- undertake the role of lead practitioner where appropriate and where there is sufficient capacity and expertise
- support the child and family to participate in assessment and planning.

Any Family Help plan should be developed with the child and family and reviewed as circumstances and needs change.

School Approach to Working with Families

At St Mary's, our work with children and families will be:

- child-centred
- respectful
- strengths-based
- inclusive
- anti-discriminatory
- responsive to communication and accessibility needs
- professionally curious
- focused on improving outcomes for the child.

We will seek to understand the child in the context of their family and wider circumstances while ensuring that the child's safety and welfare remain central.

We will recognise and build upon family strengths while remaining alert to circumstances in which parents, carers or other family members may not be acting in the child's best interests.

Child and Family Participation

Children and families should, wherever appropriate, be involved in:

- identifying needs
- assessments
- planning
- meetings
- reviewing progress
- decisions about support.

The child's wishes and feelings must be sought and considered in a manner appropriate to their age, development and communication needs.

The school will provide reasonable adjustments, interpretation or other communication support where required.

Working With Parents and Carers

We will normally work openly and transparently with parents and carers.

We will:

- explain concerns clearly
- listen to and consider parents' and carers' views
- explain the purpose of meetings and referrals
- clarify actions, responsibilities and timescales
- encourage parents and carers to participate in planning and decision-making
- provide information in an accessible way
- signpost or facilitate access to additional support where appropriate.

However, partnership with parents must never override the duty to safeguard the child.

Where informing or seeking consent from a parent or carer could place a child at increased risk, prejudice an investigation or otherwise be contrary to the child's welfare, the school may take safeguarding action without first informing them.

Escalation

Family Help must not be used where statutory child protection intervention is required.

Where:

- concerns increase
- the child's circumstances deteriorate
- Family Help is not achieving sufficient change
- new safeguarding information emerges; or
- there is reasonable cause to suspect that the child is suffering or likely to suffer significant harm,

the DSL will consider escalation and/or referral to Children's Social Care without unnecessary delay.

A lack of parental consent to Family Help must not prevent action where the threshold for statutory safeguarding intervention may be met.

8. Confidentiality and Information Sharing

Effective information sharing is essential to safeguarding children.

No single practitioner can have a complete picture of a child's needs and circumstances. Information held by different professionals may need to be brought together to identify patterns of harm, assess risk and ensure that children receive appropriate help and protection.

Principles of Information Sharing

Staff must understand that:

- information sharing is vital to identifying and responding to abuse, neglect and exploitation
- safeguarding information should be shared as early as necessary to support effective decision-making
- data protection law does not prevent the sharing of information for the purpose of safeguarding children
- consent is not always required before safeguarding information can be shared
- fears about sharing information must not prevent appropriate safeguarding action
- information should be shared only with those who need it for a legitimate safeguarding purpose
- information shared should be relevant, necessary, accurate, appropriately contextualised and proportionate.

The school will comply with applicable data protection legislation, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.

Proactive Information Sharing

Staff should not wait to be asked for information where sharing it is necessary to safeguard a child.

When deciding what information to share, staff should consider:

- its relevance to the current safeguarding concern
- what the recipient needs to know in order to safeguard the child
- whether the information is accurate
- whether it clearly distinguishes fact, observation, professional opinion and information received from others
- whether sufficient context has been provided
- whether the information shared is proportionate to the safeguarding purpose.

Care must be taken not to omit information which may be important to understanding or managing safeguarding risk.

Consent

Consent should be sought where it is appropriate, safe and lawful to do so.

However, safeguarding information may be shared without consent where there is a lawful basis and there is good reason to do so.

This may include circumstances where:

- it is not possible to obtain consent
- it would not be reasonable to expect the school to seek consent
- seeking consent would cause an unsafe delay
- seeking consent could place a child or another person at increased risk
- seeking consent could prejudice a Police or Children's Social Care investigation.

Where information is shared without consent, the reason for doing so will be recorded.

Transparency With Families

Where it is safe and appropriate, the school will be open with children and families about:

- what information is being shared
- who it is being shared with
- why it is being shared.

There will be circumstances where it is not appropriate to inform a parent or carer before information is shared. The child's welfare and safety will remain the primary consideration.

Recording Information-Sharing Decisions

Safeguarding records should show:

- what information was shared
- with whom it was shared
- the purpose of sharing
- the lawful safeguarding rationale
- whether consent was sought or obtained
- where consent was not sought, why this was considered appropriate
- the date of the decision

- who made the decision.

Decisions not to share information where sharing was considered should also be recorded, together with the rationale.

Confidentiality

Safeguarding information will be treated confidentially but confidentiality is not absolute.

Information will be accessible only to those who need it for safeguarding or other legitimate purposes.

Staff must never promise a child that information will be kept secret.

Where a child asks for confidentiality, staff should explain sensitively that information may need to be shared with people who can help keep them or somebody else safe.

The child's wishes and feelings will be considered, but they cannot override the school's responsibility to safeguard children.

Sensitive Safeguarding Cases

In cases involving sexual harassment, harmful sexual behaviour or sexual violence, the school will take appropriate steps to protect the privacy and dignity of all children involved.

Information will be shared only with those who need it.

Staff will be alert to:

- the risk of information being circulated through social media or messaging
- the impact of rumours and peer discussion
- the potential impact on the child's emotional wellbeing
- legal restrictions on reporting or identifying individuals.

Where a report may involve a criminal offence, the DSL will consider referral to the Police in accordance with statutory guidance and relevant Police guidance.

Safeguarding Records

Safeguarding information will be:

- recorded promptly
- factual and clear
- securely stored
- kept separate from the main pupil record where required
- accessible to the DSL and appropriately authorised staff
- transferred securely when a child moves school.

Further requirements relating to safeguarding records and the transfer of child protection files are set out in the Record Keeping section of this policy.

Current Information-Sharing Guidance

The school will follow *Working Together to Safeguard Children 2026, Keeping Children Safe in Education 2026*, applicable data protection legislation and current DfE and Information Commissioner's Office guidance on safeguarding information sharing.

The school's procedures will be updated where necessary when new statutory information-sharing guidance comes into force.

9. Recognising and Responding to Abuse, Neglect and Exploitation

All staff must be able to recognise indicators of abuse, neglect and exploitation and understand what action to take when they have a concern about a child.

Staff must maintain an attitude of **"it could happen here"** and remain professionally curious.

Concerns should never be dismissed because:

- a child has not made a direct disclosure
- there is no single obvious indicator of abuse
- behaviour appears to have another explanation
- a concern appears minor when considered in isolation
- a child appears reluctant to engage with support
- a child appears to defend or remain loyal to a person or group who may be harming them.

Safeguarding concerns often overlap. Children may experience several forms of harm at the same time, both online and offline.

Staff must report concerns without delay in accordance with the procedures set out in this policy.

Abuse

Abuse is a form of maltreatment of a child.

A person may abuse or neglect a child by:

- inflicting harm; or
- failing to act to prevent harm.

Harm can include ill-treatment that is not physical as well as the impact of seeing, hearing or experiencing the effects of the ill-treatment of another person.

Abuse can:

- occur inside or outside the home

- take place in an institution or community setting
- occur online
- be facilitated through technology
- be perpetrated by adults
- be perpetrated by other children
- involve individuals or groups.

The four main categories of abuse are physical abuse, emotional abuse, sexual abuse and neglect.

Physical Abuse

Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating
- otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve:

- conveying to a child that they are worthless, unloved or inadequate
- making a child feel valued only insofar as they meet the needs of another person
- preventing a child from expressing their views
- deliberately silencing or ridiculing a child
- imposing expectations that are inappropriate for the child's age or development
- overprotecting a child or limiting their exploration, learning or social interaction
- causing a child to feel frightened, unsafe or in danger

- serious bullying, including cyberbullying
- exploitation or corruption of a child
- the child seeing, hearing or experiencing the effects of the ill-treatment of another person.

Some level of emotional abuse is involved in all forms of maltreatment, although it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening.

Sexual abuse may involve physical contact, including:

- rape
- assault by penetration
- oral sex
- masturbation
- kissing
- rubbing
- touching inside or outside clothing.

It may also involve non-contact activities, including:

- involving children in looking at or producing sexual images
- exposing children to sexual activities
- encouraging children to behave in sexually inappropriate ways
- grooming a child in preparation for abuse
- sexual abuse taking place online
- technology being used to facilitate abuse offline
- coercing a child into producing or sharing sexual content.

Sexual abuse can be perpetrated by men, women or other children. Staff should recognise that most child sexual abuse is committed by someone known to the child.

A child of any age or gender can experience sexual abuse.

Neglect

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

Neglect may occur during pregnancy as a result of substance misuse.

After birth, neglect may involve a parent or carer failing to:

- provide adequate food, clothing or shelter
- protect a child from physical or emotional harm or danger
- ensure adequate supervision
- ensure access to appropriate medical care or treatment
- respond adequately to a child's emotional needs.

Neglect may be difficult to identify because individual incidents can appear minor. Staff must therefore remain alert to repeated patterns and cumulative harm.

Child Exploitation

Child exploitation involves an individual or group taking advantage of an imbalance of power to coerce, manipulate, deceive or control a child for the benefit of another person.

Children may be exploited:

- sexually
- criminally
- financially
- through forced labour
- through trafficking or modern slavery
- online
- by individuals, peer groups, gangs or organised networks.

A child may not recognise that they are being exploited.

They may believe that the person or group exploiting them is:

- a friend
- a boyfriend or girlfriend
- part of their peer group
- someone providing protection, affection, status, money, gifts, drugs or somewhere to stay.

A child may appear to cooperate with or defend those exploiting them. This does not mean that exploitation is not occurring.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity:

- in exchange for something the child needs or wants; and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

A child may have been sexually exploited even where the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact and may occur through technology.

Staff must recognise that CSE can be perpetrated by:

- individuals
- peers
- adults
- groups
- organised or loosely connected networks.

Group-based child sexual exploitation may involve two or more people who facilitate or participate in the sexual exploitation of children.

Child Criminal Exploitation

Child criminal exploitation occurs where an individual or group uses an imbalance of power to coerce, manipulate or deceive a child into criminal activity.

This may:

- be in exchange for something the child needs or wants
- provide financial or other advantage to the perpetrator
- occur through violence or threats of violence
- involve county lines
- involve theft, robbery or drug supply
- involve financial exploitation or money laundering
- involve children being used to hold or move weapons, drugs, money or other items.

Children who are criminally exploited are victims of abuse even where they have committed offences.

Staff must consider the possibility that apparently offending behaviour may be linked to coercion, exploitation or trafficking.

Children who have been exploited may be criminalised for conduct carried out because of coercion, control or exploitation. This must not prevent staff from recognising them as victims and providing an appropriate safeguarding response.

Modern Slavery and Trafficking

Modern slavery may include:

- human trafficking
- slavery
- servitude
- forced or compulsory labour
- criminal exploitation
- sexual exploitation.

Where modern slavery or trafficking is suspected, the DSL will consider the appropriate safeguarding referral and whether referral through the National Referral Mechanism is required.

Extra-Familial Harm

Children may experience abuse or exploitation outside their family home.

Extra-familial harm can occur:

- at school
- in peer groups
- in parks, streets and other community locations
- on school transport
- during activities outside school
- in other people's homes
- online.

It may include:

- child criminal exploitation
- county lines
- child sexual exploitation
- group-based sexual exploitation
- serious violence
- sexual violence and harassment

- harmful sexual behaviour
- trafficking and modern slavery
- online abuse
- radicalisation.

Where extra-familial harm is suspected, the school will consider the wider contexts and relationships associated with the harm, rather than focusing only on the child's family.

Serious Violence

Staff should be alert to signs that a child may be at risk of, or involved in, serious violence. Indicators may include increased absence from school, changes in friendships or relationships, a significant decline in performance, signs of self-harm, unexplained injuries, changes in wellbeing, or unexplained gifts or possessions.

Risks may be increased for children who have experienced disrupted education, including repeated suspension, permanent exclusion or time in alternative provision, and for children with a history of offending or involvement with criminal groups.

The school will consider when and where a child may be at greatest risk, including during travel to and from school and immediately after the school day. Where concerns arise, the DSL will assess the risks to the child and others and will consider appropriate safety planning, support and referral.

Child-on-Child Abuse

Sexual behaviour between children exists on a continuum. It may range from developmentally expected behaviour through inappropriate, problematic or abusive behaviour to harmful sexual behaviour, sexual harassment and sexual violence. Decisions must take account of the children's ages and stages of development, the nature and context of the behaviour, consent, any difference in power or ability, coercion, frequency, intent and the impact on those involved.

Children can abuse other children.

Child-on-child abuse can occur:

- between two children
- within groups
- between children of different ages
- inside or outside school
- online or offline
- in intimate relationships.

All staff must maintain an attitude of **“it could happen here”**.

The absence of reports does not mean that child-on-child abuse is not occurring.

St Mary's has a zero-tolerance approach to abusive behaviour between children.

This means that abusive behaviour will never be ignored, normalised or dismissed as:

- banter
- joking
- part of growing up
- boys being boys
- harmless experimentation.

Child-on-child abuse may include:

- bullying, including cyberbullying
- prejudice-based and discriminatory bullying
- physical abuse
- serious physical violence
- threats of violence, including threats involving weapons
- abuse in intimate relationships between children
- sexual violence
- sexual harassment
- causing another person to engage in sexual activity without consent
- harmful sexual behaviour
- making or sharing nude or semi-nude images
- AI-generated or digitally manipulated sexual images
- upskirting
- initiation or hazing-type behaviour
- online harassment or abuse.

Making or Sharing Nudes and Semi-Nudes

All incidents involving the making or sharing of nude or semi-nude images by children require a safeguarding response.

This includes material that is:

- consensually shared
- non-consensually shared
- coerced
- produced through pressure or exploitation

- generated or manipulated using artificial intelligence or other digital technology.

Staff must not:

- view images unless there is a clear and unavoidable safeguarding reason
- copy or save images
- forward images
- ask a child to send an image to them
- investigate the incident themselves.

The incident must be reported immediately to the DSL, who will follow current safeguarding guidance and consider whether Children's Social Care or the Police need to be involved.

Responding to Child-on-Child Abuse

Where a report of child-on-child abuse is made:

- staff must listen carefully and take the report seriously
- staff must not investigate or ask leading questions
- the concern must be recorded accurately
- the DSL must be informed without delay.

The school recognises that a child who displays harmful behaviour may themselves have experienced abuse, neglect, exploitation or trauma and may also require safeguarding support.

The needs and safety of all children involved will be considered separately.

Domestic Abuse

Domestic abuse can include:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological or emotional abuse
- technology-facilitated abuse
- stalking.

Domestic abuse may occur between current or former intimate partners or family members.

It may also include abuse within teenage intimate relationships and child-to-parent or adolescent-to-parent abuse.

Staff should recognise that children can also cause harm to parents, carers or other family members. Child-to-parent or caregiver abuse may include physical violence, threats, coercive or controlling behaviour, emotional abuse or other harmful behaviour. Where concerns arise, staff must consider the safeguarding needs of all children involved and report the concern to the DSL.

Under the Domestic Abuse Act 2021, a child is recognised as a victim of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse and are related to either the victim or perpetrator.

Domestic abuse can have a significant and long-lasting impact on children's:

- physical and mental health
- emotional wellbeing
- relationships
- behaviour
- attendance
- ability to learn.

The school will respond to domestic abuse as a safeguarding concern and will work with relevant services, including through Operation Encompass where applicable.

Controlling and Coercive Behaviour

Controlling or coercive behaviour is a pattern of behaviour used to hurt, humiliate, intimidate, isolate, exploit or dominate another person.

Children may be:

- directly subjected to coercive control
- affected by coercive control between adults
- used by one adult as a means of controlling another.

Staff should consider the impact of patterns of coercive behaviour on the child rather than assessing individual incidents in isolation.

Female Genital Mutilation

Female Genital Mutilation is a form of child abuse and is illegal in the United Kingdom.

FGM includes procedures involving partial or total removal of external female genitalia or other injury to female genital organs for non-medical reasons.

Mandatory Reporting Duty for Teachers

Teachers have a statutory duty to report directly to the Police where, in the course of their professional duties:

- a girl under the age of 18 informs them that an act of FGM has been carried out on her; or
- they observe physical signs which appear to show that FGM has been carried out on a girl under 18 and there is no reason to believe that the act was medically necessary.

The teacher must also inform the DSL unless there is a good reason not to do so.

Where FGM is suspected or a child is believed to be at risk, but it is not known to have been carried out, the mandatory Police-reporting duty does not apply. The concern must instead be reported immediately to the DSL, who will follow safeguarding procedures.

Staff who are not teachers must report any concern about FGM to the DSL immediately.

Preventing Radicalisation

Protecting children from the risk of radicalisation is part of the school's wider safeguarding responsibilities.

Under Section 26 of the Counter terrorism and Security Act 2015, schools must have due regard to the need to prevent people from being drawn into terrorism. This is known as the **Prevent duty**.

Radicalisation is the process through which a person comes to support terrorism or extremist ideologies associated with terrorism.

There is no single profile of a child who may be susceptible to radicalisation.

Staff should remain professionally curious about changes in:

- behaviour
- relationships
- language
- online activity
- expressed views
- peer groups
- isolation
- vulnerability to influence or manipulation.

Indicators must always be considered in context.

The school will not treat lawful political, religious or social views as safeguarding concerns simply because they are controversial or different.

Where concerns arise, the DSL will consider the nature and level of risk and may:

- seek advice
- make a safeguarding referral
- make a Prevent referral
- refer to Channel where appropriate
- contact the Police where there is an immediate risk.

Channel is a voluntary multi-agency programme which provides support to people identified as being susceptible to radicalisation.

Where further or new relevant information comes to light while a Prevent referral is being assessed, the DSL will ensure that this information is passed promptly to the Police.

The school will follow the current Prevent Duty Guidance and local referral procedures.

Mental Health and Safeguarding

Mental health difficulties do not in themselves mean that a child is experiencing abuse or neglect.

However, changes in a child's mental health, behaviour or emotional presentation may be an indicator that the child:

- has experienced abuse, neglect or exploitation
- is currently experiencing harm
- requires additional help or support.

Only appropriately trained professionals should diagnose mental health conditions.

All staff, however, have an important role in observing children and recognising changes or concerns.

Staff should be alert to:

- significant changes in behaviour or emotional presentation
- withdrawal
- persistent anxiety or distress
- self-harm
- suicidal thoughts or statements
- significant changes in attendance
- deteriorating relationships

- marked changes in eating, sleeping or self-care
- unexplained changes that may indicate abuse, neglect or exploitation.

Responding to Mental Health Concerns

Where a member of staff has concerns about a child's mental health or emotional wellbeing, they should:

- record the concern accurately
- consider whether there may be an underlying safeguarding issue
- report safeguarding concerns to the DSL without delay.

The DSL will consider:

- whether there is an immediate safeguarding risk
- whether the child may have experienced abuse, neglect or exploitation
- what school-based support may be appropriate
- whether parents or carers should be involved
- whether support or referral from health, mental health, Family Help or Children's Social Care services is required.

Where appropriate, the DSL may liaise with relevant pastoral or mental health staff while maintaining appropriate safeguarding confidentiality.

If there is reason to believe that a child is at immediate risk of serious harm, emergency safeguarding procedures will be followed.

What Staff Must Do if Abuse, Neglect or Exploitation Is Suspected or Disclosed

Where a child makes a disclosure, or a member of staff has a safeguarding concern, staff must:

- listen carefully
- remain calm
- take the child seriously
- not express shock or disbelief
- not promise confidentiality
- reassure the child that they have done the right thing by speaking
- explain that information may need to be shared with people who can help keep them safe
- avoid leading or investigative questions
- record what was said as accurately as possible

- distinguish clearly between fact, observation and professional opinion
- report the concern to the DSL or Deputy DSL without delay.

Staff must not investigate safeguarding concerns themselves.

If the DSL or Deputy DSL is unavailable and there is an urgent safeguarding concern, staff must not delay action and may contact Children's Social Care and/or the Police directly.

Where a child is in immediate danger or at risk of immediate serious harm, the Police and/or Children's Social Care must be contacted immediately.

Assessing and Responding to Child-on-Child Abuse

Where concerns are raised about child-on-child abuse, the school will take them seriously and respond in a fair, proportionate and safeguarding-focused way.

The DSL will consider the needs and safety of all children involved, including:

- the child who has experienced the harm
- the child or children alleged to have caused the harm
- witnesses
- siblings
- other children who may be affected or at risk.

The DSL will consider whether parents or carers should be informed and involved.

Parents and carers will normally be involved unless doing so could:

- place a child at increased risk
- prejudice a Police or Children's Social Care investigation
- interfere with safeguarding enquiries
- otherwise be contrary to the child's welfare.

Consent is not required before making a safeguarding referral where there is a lawful basis to share information and safeguarding action is necessary.

Where there may have been a criminal offence, the DSL will consider referral to the Police in accordance with current statutory guidance and relevant Police advice.

School-based safeguarding action will continue alongside any Police or Children's Social Care involvement.

Proportionate Safeguarding Response

Any safeguarding measures will be:

- child-centred
- proportionate to the identified risk

- regularly reviewed
- designed to preserve children's access to education wherever safely possible.

There may be circumstances in which changes to routines, supervision, movement around school, seating, clubs, trips, transport or other arrangements are required to keep children safe.

These arrangements must not place an unreasonable burden on the child who has experienced the harm.

Creating a Culture in Which Children Feel Safe to Report Concerns

St Mary's recognises that safeguarding is strengthened when children know that adults will listen, believe them and act appropriately.

We therefore work proactively to create an environment in which children:

- understand what safe and unsafe behaviour looks like
- know that abusive or discriminatory behaviour is not acceptable
- know how to report concerns
- can identify trusted adults
- understand that they will be taken seriously
- know that they will not be blamed for asking for help.

Staff are expected to challenge:

- derogatory or discriminatory language
- sexualised language
- harmful or inappropriate touching
- harassment
- bullying
- pressure to make or share sexual images
- abusive behaviour presented as joking or banter.

Preventative education will be used to address:

- healthy relationships
- consent
- respect
- boundaries
- online behaviour

- bullying
- sexual harassment
- harmful sexual behaviour
- help-seeking.

Patterns of reports will be considered at whole-school level.

Where safeguarding concerns suggest that there may be wider environmental or cultural issues within the school, the school will review:

- supervision
- locations in which incidents are occurring
- behaviour expectations
- curriculum provision
- staff training
- online-safety arrangements
- policies and procedures.

Recognising That Children May Communicate Harm in Different Ways

Children do not always make a clear or direct verbal disclosure.

Staff must be alert to the possibility that a child may communicate distress or harm through:

- changes in behaviour
- withdrawal
- aggression
- anxiety
- changes in attendance
- changes in friendships
- sexualised behaviour
- physical symptoms
- drawings, play or written work
- comments made indirectly
- information shared by friends or siblings
- online behaviour.

A child may:

- not understand that what is happening to them is abusive
- not know how to explain it
- fear consequences
- feel loyalty towards the person causing harm
- believe they will not be believed
- experience communication difficulties
- require additional time or alternative methods of communication.

Children with SEND, communication needs, younger children and children learning English as an additional language may require additional support to communicate their experiences.

Staff will use appropriate communication support and reasonable adjustments to help children express their wishes and feelings.

Responding When a Child Makes a Disclosure

Children may disclose safeguarding concerns spontaneously to any member of staff or other trusted adult.

When a child speaks about something that may indicate abuse, neglect or exploitation, the adult should:

- listen carefully
- remain calm
- allow the child to speak in their own words
- take the child seriously
- avoid expressing shock or disbelief
- avoid making assumptions
- use open prompts only where clarification is necessary
- avoid leading, repeated or investigative questioning
- reassure the child that they have done the right thing by speaking
- reassure the child that they are not in trouble
- explain that information may need to be shared with people who can help keep them safe
- never promise confidentiality
- explain, as far as possible, what will happen next
- record and report the concern without delay.

Where appropriate, the child's exact words should be recorded.

Staff must not investigate the allegation themselves.

Supporting Children to Communicate

Staff will take account of:

- age
- developmental level
- SEND
- speech, language and communication needs
- English as an additional language
- disability
- cultural context.

Where needed, the school will use:

- communication aids
- symbols
- visual supports
- interpreters
- trusted adults
- additional processing time
- other reasonable adjustments.

The use of an interpreter or communication support must not unnecessarily delay urgent safeguarding action.

Recording Safeguarding Concerns

All safeguarding concerns must be recorded promptly on the school's safeguarding recording system, CPOMS, in accordance with school procedures.

Records should:

- be clear and factual
- include the date, time and relevant context
- record what was seen, heard or disclosed
- use the child's own words where relevant
- identify the source of information
- distinguish between fact, observation, professional opinion and information reported by others

- avoid speculation or unsupported assumptions
- include relevant injuries or marks observed or described
- record actions taken
- record decisions and the reasons for them.

Where a body map or other record of injury is required, this should be completed in accordance with school safeguarding procedures.

Staff must not take photographs of injuries on personal devices.

Safeguarding records are confidential and will be shared only with those who have a legitimate need to know.

Staff must not discuss safeguarding information casually or more widely than necessary.

However, information may be shared appropriately with relevant staff or professionals where this is necessary to safeguard or support the child.

What Staff Must Do if They Have Concerns About a Child

Any member of staff, including supply staff, trainee teachers, contractors, volunteers, governors or other adults working in or on behalf of the school, who has concerns about a child's welfare must act without delay.

Staff must:

- maintain an attitude of "it could happen here"
- act in the child's best interests
- take concerns seriously
- record the concern
- report it promptly to the DSL or Deputy DSL
- consider whether urgent medical attention is required
- follow emergency procedures where there is immediate danger.

If the DSL or Deputy DSL is unavailable, this must not delay action.

Any member of staff may contact Children's Social Care and/or the Police directly where necessary.

The DSL should be informed as soon as practicable.

Action by the DSL

When a safeguarding concern is reported, the DSL or Deputy DSL will consider:

- the nature and seriousness of the concern
- the child's immediate safety
- information already held
- previous concerns and patterns
- the child's wishes and feelings
- the child's age and developmental level
- SEND, communication and medical needs
- family circumstances
- extra-familial risks
- whether other children may also be at risk.

The DSL may:

- speak with the child
- consult relevant staff
- speak with parents or carers where appropriate and safe
- seek safeguarding advice
- manage support internally through the school's pastoral and safeguarding arrangements, including considering whether parents or carers should be informed to support the child's wellbeing, provided that doing so would not place the child at additional risk or prejudice safeguarding enquiries
- consider Family Help
- make a referral to Children's Social Care
- contact the Police
- make another specialist referral where appropriate.

The DSL will use current Brents safeguarding thresholds, criteria and local referral procedures to inform decision-making.

A history of apparently minor concerns may indicate cumulative harm. Previous safeguarding information will therefore be considered when assessing new concerns.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care will be made without unnecessary delay.

Parental consent is not required before a child protection referral where seeking consent would place a child at greater risk, cause unsafe delay or otherwise undermine the safeguarding response.

Referrals to Children's Social Care

Professional referrals will be made through Brent's current safeguarding referral arrangements.

The school will ensure that staff have access to up-to-date local referral information and contact details.

Where a referral is made, the school should receive information about the action being taken.

The DSL will follow up where:

- acknowledgement is not received
- the response is unclear
- agreed action does not occur
- concerns remain or increase.

Where the school disagrees with a safeguarding decision or considers that the response does not adequately protect the child, the DSL will use Brent's escalation and professional-challenge procedures.

Any member of staff may make a referral directly where necessary.

If a child is in immediate danger or a serious crime is taking place, the Police should be contacted immediately.

Children's Right to Report Safeguarding Concerns

At St Mary's, children can speak to any trusted adult about something that worries them.

Children will be taught that:

- they can talk to any member of staff
- their concern will be taken seriously
- they will be listened to without judgement
- they do not have to wait until a problem becomes serious before asking for help
- staff may need to share information with other adults in order to keep them safe.

Where possible, children will be:

- told what will happen next
- informed about who information may be shared with
- supported to express their wishes and feelings

- given access to a trusted adult for ongoing support where appropriate.

Children will not be promised absolute confidentiality.

Where concerns indicate that the child or family may benefit from Family Help, the school will discuss appropriate support with the child and family where it is safe to do so.

Where there is risk of significant harm, safeguarding action will take priority.

Risk Assessment, Safety Planning and Support

Where a safeguarding concern involves child-on-child abuse, harmful sexual behaviour, sexual harassment, sexual violence or another significant risk, the DSL will consider whether a documented risk assessment and/or safety and support plan is required.

The purpose of the plan is to:

- identify current risks
- identify who may be at risk
- consider the needs of all children involved
- identify protective measures
- clarify responsibilities
- ensure children know who they can speak to
- support continued access to education
- review whether arrangements remain effective.

The assessment may consider:

- classrooms
- corridors
- playgrounds
- toilets and changing areas
- lunch and break times
- clubs
- trips
- transport
- online contact
- arrival and departure from school.

Risk assessments and safety plans will be:

- recorded
- proportionate
- regularly reviewed
- updated when circumstances change.

School risk assessment does not replace assessment by Children's Social Care, Police, health services or other specialist agencies.

Relevant information from partner agencies will be considered where appropriate.

The school will avoid arrangements which unnecessarily isolate, disadvantage or restrict the education of a child who has experienced harm.

10. Online Safety, Filtering and Monitoring

Online safety is an integral part of safeguarding at St Mary's.

Technology can provide significant benefits for children's learning, communication and participation. It can also facilitate abuse, exploitation, bullying and other forms of harm.

Online and offline safeguarding cannot be considered separately. In many cases, harmful behaviour moves between both environments.

The Governing Body will ensure that appropriate safeguarding arrangements are in place to protect children when using the school's technology and internet services.

The DSL has lead responsibility for online-safety safeguarding matters and must understand the filtering and monitoring systems and processes in place.

The school will:

- maintain appropriate filtering and monitoring systems
- regularly review their effectiveness
- educate children about online safety
- ensure staff understand their responsibilities for online safeguarding
- provide appropriate information to parents and carers
- establish clear procedures for reporting and responding to online incidents
- manage use of mobile and smart technology in accordance with school policy
- consider emerging risks associated with new technologies, including generative artificial intelligence.

The Four Areas of Online Risk

The school's approach reflects the four broad areas of online risk identified in *Keeping Children Safe in Education*.

Content

Children may be exposed to illegal, inappropriate or harmful material, including:

- pornography
- violent or extremist material
- discriminatory or hateful content
- content promoting self-harm or suicide
- misinformation and disinformation
- harmful or inappropriate AI-generated material.

Contact

Children may experience harmful interaction with other users, including:

- grooming
- exploitation
- sexual or criminal coercion
- adults impersonating children
- peer pressure
- harmful communication
- unwanted contact.

Conduct

A child's own online behaviour, or the behaviour of others towards them, may create or increase risk.

This may include:

- cyberbullying
- abusive or discriminatory communication
- making or sharing nude or semi-nude images
- AI-generated or digitally manipulated sexual imagery
- sexual harassment
- sharing harmful or illegal content
- unsafe sharing of personal information.

Commerce

Children may be exposed to risks associated with:

- scams
- phishing
- financial exploitation
- inappropriate advertising
- gambling-related content
- in-app purchases or other commercial pressure.

Further arrangements relating to filtering, monitoring, mobile technology and online-safety education are set out below.

Online Safety Education

Online safety forms part of the school's whole-school safeguarding approach and is taught through the curriculum in an age-appropriate and accessible way.

Children will be taught about:

- safe and responsible use of the internet and technology
- protecting personal information
- recognising harmful, inappropriate or manipulative online behaviour
- online friendships and contact with people they do not know offline
- grooming and exploitation
- cyberbullying
- making and sharing nude or semi-nude images
- AI-generated or digitally manipulated imagery
- misinformation and disinformation
- financial scams and online commercial risks
- how and where to report concerns.

Teaching will be adapted where necessary so that children with SEND, communication needs or other additional needs can understand and apply online-safety learning.

Staff Training

All staff will receive safeguarding training which includes online safety.

Staff must understand:

- the four broad areas of online risk: Content, Contact, Conduct and Commerce
- the school's filtering and monitoring arrangements

- their responsibilities for reporting online safeguarding concerns
- the risks associated with mobile and smart technology
- online grooming and exploitation
- technology-facilitated abuse
- generative artificial intelligence and emerging digital risks.

Training will be provided at induction and updated regularly, including at least annually through safeguarding updates.

Parents and Carers

The school will provide parents and carers with appropriate information about online safety and the school's expectations regarding technology.

This may include:

- guidance and information
- parent workshops
- newsletters
- links to trusted safeguarding resources
- information about reporting concerns
- information about emerging online risks.

Filtering and Monitoring

The Governing Body has overall strategic responsibility for ensuring that appropriate filtering and monitoring arrangements are in place.

The school will maintain systems which are appropriate to:

- the age of pupils
- the needs and vulnerabilities of pupils
- the technology used by the school
- the risks faced by the school community.

The filtering system should prevent access to illegal and inappropriate content while avoiding unreasonable restrictions which interfere with legitimate teaching and learning.

Monitoring arrangements should enable the school to identify concerning online activity and respond to safeguarding risks promptly.

Annual Review

Filtering and monitoring provision will be reviewed **at least once every academic year**.

The review will involve:

- relevant members of the senior leadership team
- the Designated Safeguarding Lead
- IT support
- the responsible governor.

The review will consider:

- whether filtering is working effectively
- whether monitoring arrangements identify safeguarding concerns appropriately
- whether the systems operate effectively on all school-managed internet-connected devices
- whether they operate appropriately in all relevant locations
- pupils' age and risk profile
- SEND and communication needs
- English as an Additional Language
- changes in technology
- emerging online risks
- generative-AI tools used in school
- safeguarding incidents and alerts
- curriculum requirements
- staff training needs.

The outcome of the review will be recorded and actions followed up.

Additional checks or reviews will be carried out where:

- a safeguarding risk is identified
- new technology or devices are introduced
- generative-AI tools are introduced
- significant software or network changes occur
- working practices change
- there are concerns about the effectiveness of filtering or monitoring.

The annual review will involve:

- the senior leadership team member responsible for filtering and monitoring
- the Designated Safeguarding Lead

- appropriate IT support
- the governor responsible for safeguarding oversight, where appropriate.

The review will consider the effectiveness of the school's filtering and monitoring arrangements across school-owned devices, networks and relevant locations, taking account of the age and needs of pupils, including pupils with SEND and other vulnerabilities, and emerging technological risks.

The outcome of the review, including any identified actions, will be recorded.

Generative Artificial Intelligence

The school recognises that generative AI may provide educational benefits but may also create safeguarding and data-protection risks.

Risks may include:

- generation of harmful or age-inappropriate content
- AI-generated child sexual abuse material
- digitally manipulated sexual imagery or deepfakes
- misinformation and disinformation
- impersonation
- bullying and harassment
- privacy and data-protection risks
- exposure to manipulative or inappropriate interactions.

Where generative-AI tools are used, the school will consider:

- age appropriateness
- safeguarding risks
- filtering and monitoring capability
- privacy and data protection
- whether personal or sensitive information may be entered into the system
- the needs of vulnerable pupils.

Mobile Phones and Smart Technology

St Mary's will maintain a policy which prohibits pupil use of mobile phones throughout the school day, in accordance with statutory DfE guidance, subject to any reasonable and necessary exceptions.

This includes:

- lessons

- breaktimes
- lunchtimes
- movement around the school.

Any exceptions will be clearly defined and managed by the school.

The school's Behaviour Policy and/or Mobile Phone Policy sets out:

- expectations for pupils
- storage arrangements
- consequences for breaches
- reasonable exceptions
- arrangements for smart watches and other communication devices where applicable.

Staff must follow the school's Code of Conduct regarding personal mobile phones, cameras and smart devices.

Personal devices must not be used to photograph or record pupils unless specifically authorised in accordance with school policy.

Where searching or confiscating a pupil's device is necessary, staff will follow current statutory guidance and school procedures.

Role of the DSL in Online Safety

The DSL has lead responsibility for safeguarding concerns relating to online safety.

The DSL will:

- understand the filtering and monitoring systems and processes in place
- work with senior leaders and IT support
- review safeguarding alerts and concerns
- ensure relevant concerns are recorded
- identify patterns and emerging risks
- ensure appropriate safeguarding action is taken
- contribute to the annual filtering and monitoring review
- advise the Governing Body on safeguarding implications where appropriate.

All staff must understand how to escalate concerns arising from filtering and monitoring alerts or online incidents.

11. Safeguarding Concerns or Allegations About Adults Working With Children

All adults working in or on behalf of St Mary's are in positions of trust and are expected to maintain appropriate professional boundaries and the highest standards of conduct.

This includes:

- employees
- senior leaders
- supply teachers
- trainee teachers
- volunteers
- contractors
- agency staff
- third-party providers
- adults providing activities on school premises
- other individuals working on behalf of the school.

Concerns may relate to behaviour:

- in school
- outside school
- online
- towards a child in the school
- towards another child
- which raises questions about an adult's suitability to work with children.

All concerns about adults must be taken seriously.

There are two broad categories:

1. **Concerns or allegations that meet, or may meet, the harm threshold**
2. **Low-level concerns that do not meet the harm threshold**

Concerns or Allegations That May Meet the Harm Threshold

The harm threshold may be met where an adult working in or on behalf of the school 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.

Concerns or allegations which meet or may meet this threshold must be reported immediately.

Reporting Route

Where the concern relates to a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working on behalf of the school, it must be reported to the **Headteacher**.

Where the concern relates to the Headteacher, it must be reported to the **Chair of Governors**.

Where there is uncertainty about whether the harm threshold is met, advice will be sought from the Local Authority Designated Officer.

The school will contact the LADO without unnecessary delay and in accordance with Brent procedures.

Where a child may be at immediate risk, Children's Social Care and/or the Police will also be contacted as appropriate.

Initial Action

The Headteacher will normally act as Case Manager for safeguarding concerns or allegations about adults. Where the concern or allegation relates to the Headteacher, the Chair of Governors will act as Case Manager.

They must not conduct a substantive investigation before consulting the LADO where the harm threshold may be met.

Initial action may include:

- establishing what is alleged
- identifying whether a child is at immediate risk
- ensuring appropriate safeguarding measures are in place
- identifying whether Police or Children's Social Care involvement may be required
- preserving relevant information.

The Case Manager will follow the advice of the LADO regarding further action.

Role of the Local Authority Designated Officer

The LADO provides oversight, advice and coordination in relation to allegations about adults who work with children.

The LADO may:

- advise on whether the harm threshold is met
- coordinate information with Children's Social Care and the Police
- advise on safeguarding measures
- monitor the progress of the case
- advise on the appropriate investigation or disciplinary process
- support timely resolution.

The LADO does not normally conduct the school's internal investigation.

Managing the Allegation

The school will ensure that allegations are managed:

- promptly
- fairly
- objectively
- consistently
- confidentially
- in accordance with KCSIE and Brent safeguarding procedures.

The safety and welfare of children will remain paramount.

The school will consider:

- immediate safeguarding arrangements
- support for the child
- support for the adult subject to the allegation
- whether suspension or alternative arrangements are necessary
- confidentiality
- Police or Children's Social Care involvement
- disciplinary or capability procedures where appropriate.

Suspension

Suspension will not be an automatic response to an allegation.

The school will consider whether risks can be managed through alternative arrangements.

Where suspension is considered necessary, it will be used only where there is no reasonable alternative and in accordance with employment procedures and safeguarding advice.

Confidentiality and Support

Information relating to an allegation will be shared only with those who need it in order to:

- safeguard children
- enable appropriate enquiries
- support those involved
- manage employment or disciplinary processes.

The school will take reasonable steps to protect confidentiality.

Support for Children and Families

Parents or carers will normally be informed as soon as it is appropriate to do so, unless:

- this would place a child at greater risk
- Children's Social Care or the Police advise otherwise
- it would prejudice an investigation.

Children and families will be provided with appropriate information and support.

Support for the Adult

The adult subject to an allegation will:

- be informed at an appropriate stage
- be kept updated where appropriate
- be offered access to support
- be advised that they may seek support from a trade union or professional body.

12. Low-Level Concerns

A low-level concern is any concern, however small, about an adult working in or on behalf of the school which:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not serious enough to require referral to the LADO.

The term “**low-level**” **does not mean insignificant**.

A low-level concern may arise from:

- observation
- a complaint
- a disclosure by a child
- information from a parent
- information from another member of staff
- a concern raised by another organisation
- information identified through safer recruitment or vetting processes
- self-referral by the adult concerned.

Examples may include:

- being over-friendly with children
- showing favouritism
- using a personal phone to photograph children contrary to school policy
- engaging with a child one-to-one in an unnecessarily secluded area
- humiliating or intimidating a child
- inappropriate communication with children
- inappropriate conduct outside work which raises professional-boundary concerns.

Reporting Low-Level Concerns

At St Mary's, all low-level concerns will be reported to the **Headteacher**.

The Headteacher is the **ultimate decision-maker** in relation to low-level concerns.

Where appropriate, the Headteacher may consult the DSL when assessing and responding to a concern.

Where the concern relates to the Headteacher, it must be reported to the Chair of Governors.

Where there is doubt about whether a concern is low-level or may meet the harm threshold, advice will be sought from the LADO.

Low-level concerns involving supply staff, contractors or staff employed by another organisation will also be shared with their employer so that patterns of behaviour can be identified.

Self-Referral

The school encourages staff to self-refer where they:

- have found themselves in a situation which could be misinterpreted
- believe their behaviour may have appeared inappropriate
- recognise that they have fallen below expected professional standards
- wish to seek advice about professional boundaries.

Self-referral supports an open and transparent safeguarding culture and does not automatically imply wrongdoing.

Responding to a Low-Level Concern

The Headteacher, or an appropriately nominated person acting under their direction, will gather sufficient information to understand the concern.

This may include speaking to:

- the person who raised the concern
- the adult who is the subject of the concern
- relevant witnesses.

Where the concern was raised anonymously, this will be respected as far as reasonably possible.

The response will be proportionate and may include:

- clarification of expectations
- professional advice
- supervision
- additional training
- monitoring
- management action
- disciplinary procedures
- referral to the LADO if further information indicates that the harm threshold may be met.

The rationale for decisions and action taken will be recorded.

Recording and Reviewing Low-Level Concerns

All low-level concerns will be recorded in writing.

Records will include:

- the nature of the concern
- the context in which it arose
- the name of the person raising the concern, unless anonymity is requested and can reasonably be maintained
- action taken
- decisions made
- the rationale for those decisions.

Records will be:

- confidential
- securely stored
- kept separately from ordinary personnel records where appropriate
- processed in accordance with data-protection legislation.

Low-level-concern records will be reviewed periodically so that patterns of inappropriate, problematic or concerning behaviour can be identified.

Where a pattern is identified, the school will consider:

- whether disciplinary action is required
- whether the harm threshold may now be met
- whether the LADO should be consulted
- whether wider cultural, policy, supervision or training issues contributed to the behaviour.

Records will be retained in accordance with the school's retention schedule and applicable statutory guidance. As a minimum, the school will have regard to KCSIE's recommendation that low-level-concern records are retained at least until the individual leaves employment.

References and Low-Level Concerns

Low-level concerns will not ordinarily be included in employment references where they relate exclusively to safeguarding and have not met the harm threshold.

However, information may be included where it relates to matters which would normally be included in a reference, such as misconduct or poor performance.

Where a concern or pattern of concerns has met the harm threshold and has been substantiated, the school will follow current statutory guidance regarding references.

Managing Allegations: Monitoring and Timescales

All allegations concerning adults working with children will be progressed as promptly as possible while ensuring that:

- children are safeguarded
- the process is fair
- relevant agencies are able to carry out their functions
- unnecessary delay is avoided
- confidentiality is maintained.

The Case Manager will maintain appropriate contact with the LADO and follow agreed review points and timescales.

Where the Police or Children's Social Care are involved, the school will follow their advice about:

- enquiries
- communication
- disciplinary processes
- interviews
- information sharing
- safeguarding arrangements.

The school will not conduct an internal investigation in a way that could prejudice a Police or Children's Social Care investigation.

All staff must:

- report concerns or allegations about adults without delay
- not investigate allegations themselves
- maintain appropriate confidentiality
- follow the reporting routes set out in this policy
- act in the best interests of children.

Reporting Concerns About Adults

The following reporting routes apply:

Concern about a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working on behalf of the school

→ Report to the **Headteacher**

Concern about the Headteacher

→ Report to the **Chair of Governors**

Uncertainty about whether a concern meets the harm threshold

→ The Headteacher or Chair of Governors will seek advice from the **Local Authority Designated Officer (LADO)**

Immediate danger to a child or possible serious criminal offence

→ Children's Social Care and/or the **Police** must be contacted without delay.

Where concerns relate to an adult employed by another organisation, such as:

- a supply agency
- contractor
- sports provider
- tuition provider
- club provider,

the school will also liaise with the individual's employer.

The school will not cease safeguarding involvement simply because the individual is employed by another organisation.

Safeguarding Concerns Relating to Use of School Premises

Where an allegation or safeguarding concern relates to an incident involving an organisation or individual using the school premises, the school will follow its safeguarding procedures.

This includes provision such as:

- after-school clubs
- tuition
- sports activities
- community groups
- faith organisations
- holiday provision
- other third-party activities.

Where appropriate, the Headteacher will:

- safeguard the child
- gather basic information
- contact the LADO
- contact Children's Social Care
- contact the Police

- liaise with the provider.

The Governing Body will ensure that organisations hiring or using the school premises are required to demonstrate appropriate safeguarding arrangements.

Terms of hire and lettings agreements will make safeguarding expectations clear.

Complaints and Safeguarding

A complaint may include safeguarding information even where it was not initially presented as a safeguarding concern.

Where information arising from a complaint suggests that a child may be at risk of harm, the matter will be dealt with under safeguarding procedures and will not wait for the complaints process to conclude.

The school's Complaints Policy should not be used as an alternative to:

- child protection procedures
- procedures for allegations against adults
- whistleblowing procedures.

Whistleblowing

St Mary's is committed to an open safeguarding culture in which staff feel able to raise concerns about:

- poor or unsafe practice
- failures in safeguarding arrangements
- concerns that safeguarding procedures are not being followed
- attempts to conceal wrongdoing
- concerns that previously reported matters have not been dealt with appropriately.

Staff should normally report safeguarding concerns about practice to the Headteacher.

Where the concern relates to the Headteacher, it should be raised with the Chair of Governors.

Where staff:

- feel unable to raise a concern internally
- believe that a concern has not been acted upon
- believe that safeguarding practice remains unsafe,

they should follow the school's Whistleblowing Policy and may seek external advice.

The school will ensure that staff know how to access appropriate external whistleblowing advice, including the NSPCC Whistleblowing Advice Line.

No member of staff should be disadvantaged for raising a genuine safeguarding concern in good faith.

13. Record Keeping and Transfer of Safeguarding Records

Accurate safeguarding records are essential to protecting children.

Safeguarding records provide:

- a history of concerns
- evidence of actions taken
- a basis for identifying patterns and cumulative harm
- information necessary for multi-agency safeguarding
- continuity when staff or schools change.

Recording Concerns

All safeguarding concerns, discussions, decisions and actions will be recorded promptly.

Records should include:

- a clear summary of the concern
- date, time and relevant circumstances
- the source of the information
- the child's voice where appropriate
- the child's own words where relevant
- observations made by staff
- professional opinion where relevant and clearly identified as such
- information provided by other people, clearly attributed
- decisions made
- actions taken
- the reasons for decisions
- outcomes and follow-up.

Records must clearly distinguish between:

- fact
- direct observation

- information reported by others
- professional opinion.

A chronology will be maintained where appropriate to enable patterns and cumulative concerns to be identified.

The DSL will monitor the quality of safeguarding records and provide guidance to staff where necessary.

Safeguarding Recording System

Safeguarding information will normally be recorded on the school's secure safeguarding system.

Access will be restricted to appropriately authorised staff.

Where paper records are required, these will be stored securely and separately from the main pupil file.

Safeguarding records will be handled in accordance with:

- data-protection legislation
- safeguarding guidance
- the school's records-management arrangements.

Retention of Safeguarding Records

Safeguarding and child protection records will be retained in accordance with:

- statutory requirements
- current safeguarding guidance
- the school's approved retention schedule
- applicable records-management guidance.

The school will ensure that records are retained for sufficient periods to:

- safeguard children
- support future safeguarding enquiries
- respond to legal or regulatory requirements
- preserve information which may be important to victims and survivors.

Records known to relate to allegations or cases of child sexual abuse will be managed with particular regard to the recommendations of the Independent Inquiry into Child Sexual Abuse and any subsequent statutory or regulatory guidance.

Retention arrangements will be reviewed periodically to ensure that they remain consistent with current legal and regulatory requirements.

Transferring Child Protection Records

Where a child moves to another school or college, the DSL will ensure that the child protection file is transferred:

- securely
- separately from the main pupil file
- as soon as possible
- within statutory and KCSIE timescales.

Where a child transfers:

- during the academic year, the file should normally be transferred within five days
- at the start of a new term, the file should normally be transferred within the first five days.

The DSL will obtain confirmation that the file has been received.

Information to Accompany the Transfer

Where appropriate, the DSL will also provide the receiving setting with a clear summary of:

- current safeguarding concerns
- relevant historic information
- current risk
- ongoing support or intervention
- external agency involvement
- important contextual information.

The summary should distinguish clearly between:

- current risk
- historic concerns
- professional opinion
- verified information
- information reported by others.

Where concerns are significant or complex, the DSL will make direct contact with the receiving school's DSL before or at the point of transfer.

This is particularly important where:

- the child is subject to a Child Protection Plan

- there is current Children's Social Care involvement
- there is significant risk
- safety arrangements need to be in place immediately
- there are concerns about attendance or exploitation.

The receiving school should be given sufficient information to safeguard the child from the first day of attendance.

Children Leaving Without a Receiving School

Where a safeguarding file cannot be transferred because:

- the child is moving abroad
- the child becomes electively home educated
- the destination school is not yet known,

the file will be retained securely.

The DSL will consider whether safeguarding information should also be shared with:

- the Local Authority
- Children's Social Care
- another relevant agency,

where appropriate.

14. Safeguarding Training and Development

Safeguarding training is central to the school's whole-school approach.

The purpose of safeguarding training is to ensure that adults working with children have the knowledge, confidence and professional curiosity necessary to:

- recognise concerns
- respond appropriately
- report concerns without delay
- understand their individual safeguarding responsibilities.

All Staff

All staff will receive appropriate safeguarding and child protection training:

- at induction
- regularly thereafter
- with safeguarding updates provided at least annually.

All staff must read **Part One of Keeping Children Safe in Education 2026**.

The optional DfE Part One overview may be used as an additional quick-reference resource but does not replace Part One.

Training will include, as appropriate:

- recognising abuse, neglect and exploitation
- child-on-child abuse
- harmful sexual behaviour
- domestic abuse
- online safety
- filtering and monitoring
- generative AI and emerging online risks
- children absent or missing from education
- SEND and safeguarding
- mental health and safeguarding
- Family Help
- information sharing
- Prevent
- professional boundaries
- allegations and low-level concerns
- whistleblowing.

Training will take account of:

- local safeguarding risks
- safeguarding incidents
- learning from audits and reviews
- changes in statutory guidance.

Induction

Safeguarding induction will ensure that new staff understand:

- the Safeguarding and Child Protection Policy
- the Staff Code of Conduct
- the Behaviour Policy
- the identity and role of the DSL and Deputy DSLs
- how to record concerns

- how to report concerns about children
- how to report concerns about adults
- low-level concerns
- whistleblowing
- online safety and filtering and monitoring arrangements.

Safeguarding induction will be appropriate to the person's role.

DSL and Deputy DSL Training

The DSL and Deputy DSLs will receive training which provides the knowledge and skills required to carry out their roles effectively.

Formal DSL training will be updated at least every two years.

In addition, the DSL and Deputy DSLs will update their knowledge and skills regularly, and at least annually, through appropriate:

- safeguarding updates
- professional networks
- local authority briefings
- multi-agency training
- professional reading
- learning from safeguarding reviews.

The DSL team will maintain knowledge of:

- local thresholds and referral arrangements
- Family Help
- child protection procedures
- information sharing
- online safety
- filtering and monitoring
- Prevent
- allegations and LADO procedures
- safeguarding risks relevant to the local community.

Governor Safeguarding Training

All governors will receive safeguarding and child protection training, including online safety:

- at induction
- regularly thereafter.

Training will enable governors to:

- understand their strategic safeguarding responsibilities
- provide appropriate challenge
- test and assure themselves that safeguarding arrangements are effective
- understand filtering and monitoring responsibilities
- understand safer recruitment
- understand how allegations against adults are managed
- recognise the importance of safeguarding culture.

The Chair of Governors will receive appropriate information and training to fulfil the role of Case Manager where an allegation concerns the Headteacher.

Detailed course requirements, dates, providers, attendance and renewal dates are maintained separately in the school's Safeguarding Training and Development Matrix. The matrix is reviewed by the DSL and reported to senior leaders and governors as part of safeguarding quality assurance.

15. Quality Assurance, Review and Continuous Improvement

St Mary's is committed to ensuring that safeguarding practice is effective, reflective and continuously improving.

Safeguarding will not be treated as a policy-compliance exercise alone.

The school will seek assurance that safeguarding arrangements are working effectively in practice.

Monitoring and Quality Assurance

Safeguarding practice will be monitored through activities which may include:

- safeguarding audits
- review of safeguarding records
- sampling the quality of CPOMS entries
- review of response times and outcomes
- monitoring patterns and trends

- review of attendance and children absent from education
- review of child-on-child abuse and harmful sexual behaviour
- monitoring online-safety incidents
- review of filtering and monitoring arrangements
- review of low-level concerns
- safeguarding learning walks
- pupil voice
- staff feedback
- parent and carer feedback
- scrutiny by the safeguarding governor
- review of training records
- safer-recruitment and Single Central Record checks.

The DSL will use safeguarding information to identify:

- emerging concerns
- patterns
- vulnerable groups
- locations or times associated with risk
- training needs
- weaknesses in school systems.

Safeguarding information will be anonymised where appropriate when reported to governors.

Governance Oversight

The Governing Body will:

- provide strategic oversight and challenge
- ensure safeguarding arrangements comply with statutory requirements
- receive appropriate safeguarding information
- review the effectiveness of safeguarding systems
- monitor actions arising from safeguarding audits
- seek assurance that identified weaknesses are addressed
- ensure appropriate oversight of online safety, filtering and monitoring

- ensure appropriate safeguarding oversight of third-party provision.

Governors will not receive unnecessary confidential case details but must receive sufficient information to understand:

- the effectiveness of safeguarding practice
- trends and patterns
- risks
- actions taken
- areas requiring improvement.

Learning and Continuous Improvement

The school will learn from:

- safeguarding incidents
- complaints
- low-level concerns
- allegations
- serious incidents
- safeguarding practice reviews
- local and national safeguarding reviews
- audits
- feedback from children and families
- changes in statutory guidance.

Where weaknesses are identified, the school will:

- take corrective action
- provide additional training where appropriate
- revise procedures
- review supervision or staffing arrangements
- consider whether wider cultural issues contributed to the concern
- monitor whether improvements have been embedded.

Policy Review

This Safeguarding and Child Protection Policy will be reviewed:

- at least annually
- following significant changes to statutory guidance or legislation
- following significant changes to local safeguarding arrangements
- following a serious safeguarding incident where policy learning is identified
- whenever safeguarding practice indicates that amendment is necessary.

The policy will be approved by the Governing Body.

The DSL will coordinate the review, with appropriate involvement from:

- the Headteacher
- senior leaders
- the safeguarding governor
- the Governing Body.

The school will ensure that policy changes are communicated to staff and reflected in training and practice.

Appendix 1: Staff Safeguarding Declaration

St Mary's C.E. Primary School

Safeguarding and Child Protection Declaration 2026–27

All staff have an individual responsibility to safeguard and promote the welfare of children.

By signing this declaration, I confirm that I have:

- read and understood **Part One of Keeping Children Safe in Education 2026**
- read and understood the school's **Safeguarding and Child Protection Policy**
- read and understood the school's **Staff Code of Conduct**
- been informed of the school's safeguarding systems and procedures
- completed the safeguarding training required for my role
- been informed about the school's online-safety, filtering and monitoring arrangements
- been informed about procedures relating to child-on-child abuse
- been informed about procedures relating to low-level concerns and allegations about adults
- been informed about the school's whistleblowing procedures.

I know:

- who the Designated Safeguarding Lead and Deputy DSLs are
- how to report a concern about a child
- how to record a safeguarding concern on CPOMS
- that I must act without delay where I am concerned about a child's welfare
- that I may make a referral directly to Children's Social Care where necessary
- how to report a concern about an adult working with children
- that concerns about adults must be reported to the Headteacher
- that concerns about the Headteacher must be reported to the Chair of Governors
- that I must never promise confidentiality to a child
- that safeguarding information must be shared appropriately where necessary to protect a child
- that I must maintain an attitude of **"it could happen here"**.

I understand that safeguarding is everyone's responsibility and that I must always act in the best interests of children.

Name: _____

Role: _____

Signature: _____ **Date:** _____

Appendix 2: Governor Safeguarding Declaration

St Mary's C.E. Primary School

Governing Body Safeguarding Declaration 2026–27

By signing this declaration, I confirm that I have:

- read the school's **Safeguarding and Child Protection Policy**
- completed appropriate safeguarding and child protection training, including online safety
- been informed of the Governing Body's strategic safeguarding responsibilities
- been informed of the school's safeguarding leadership arrangements
- been informed of the school's procedures for concerns and allegations about adults
- been informed of the school's arrangements for filtering and monitoring
- been informed of the school's safer-recruitment responsibilities.

I understand that the Governing Body is responsible for providing strategic leadership, challenge and assurance in relation to safeguarding.

I understand that governors must assure themselves that:

- safeguarding policies and procedures are effective
- safeguarding is embedded throughout school practice
- staff receive appropriate safeguarding training
- the DSL has sufficient authority, time, training and resources
- safer recruitment requirements are followed
- effective filtering and monitoring arrangements are in place
- low-level concerns and allegations about adults are managed appropriately
- safeguarding arrangements for third-party providers and use of school premises are appropriate.

I understand that safeguarding information shared with governors must be treated confidentially and that governors should not seek unnecessary details of individual safeguarding cases.

Name: _____

Role: _____

Signature: _____

Date: _____

Appendix 3: Operation Encompass

St Mary's C.E. Primary School participates in **Operation Encompass**.

Operation Encompass enables Police to notify a child's education setting where Police have attended a domestic abuse incident and have reasonable grounds to believe that a child may be a victim of domestic abuse.

The Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse.

Operation Encompass applies to children connected with the household, including where the child was not physically present during the incident.

Purpose

The purpose of Operation Encompass is to enable the school to provide timely, sensitive and appropriate support following a domestic abuse incident.

A notification does not in itself determine what support a child requires. The school will consider the individual child's:

- safety
- emotional wellbeing
- presentation
- attendance
- learning needs
- wishes and feelings
- existing safeguarding or pastoral needs.

Receipt of Notifications

Operation Encompass notifications will be received by appropriately trained Key Adults.

At St Mary's, the Key Adult arrangements will include the DSL and appropriately trained Deputy DSLs.

The school will ensure that:

- access arrangements are current
- there is appropriate cover when key staff are absent
- notification systems are checked reliably
- changes in DSL or leadership personnel are reflected promptly in Operation Encompass access arrangements.

Information Sharing and Confidentiality

Operation Encompass information is safeguarding information.

It will be:

- handled confidentially
- stored securely
- recorded in accordance with the school's safeguarding procedures
- shared only with staff who need the information in order to safeguard or support the child.

Staff will not:

- question a child about the incident simply because an Operation Encompass notification has been received
- discuss the notification with other pupils or unnecessary members of staff
- take action which could inadvertently increase risk to the child or a victim of domestic abuse.

Supporting the Child

Depending on the child's circumstances, support may include:

- access to a trusted adult
- flexibility around learning
- emotional or pastoral support
- reasonable adjustments
- monitoring wellbeing and presentation
- support with attendance
- consideration of further safeguarding action.

The school will avoid drawing unnecessary attention to the child.

Safeguarding Action

Operation Encompass does not replace normal safeguarding procedures.

Where information in a notification, or the child's subsequent presentation, indicates that further safeguarding action is required, the DSL will follow the school's safeguarding procedures and may:

- seek advice
- share information
- consider Family Help
- make a referral to Children's Social Care
- contact the Police
- work with other relevant agencies.

Parents and Carers

Parents and carers will be informed through the school's general safeguarding information that St Mary's participates in Operation Encompass.

Information about individual notifications will be handled in accordance with safeguarding and information-sharing principles.