



Outcomes
First Group

SAFEGUARDING POLICY 2026/27

Syon Manor College

Designated Safeguarding Leads

Matthew Ayling, Joshua Tuckey, Kevin Coakley

Safeguarding Governor: Nicola Mullarkey

Safeguarding Policy

Contents

1.0	Policy statement	4
2.0	Local Arrangements for the school.....	6
3.1	Safeguarding	7
3.2	Contextual Safeguarding	8
3.3	Child Protection.....	8
3.5	Defining Significant Harm/Child Abuse	9
4.0	The role of governors, the proprietor and senior managers.....	10
5.0	Designated Safeguarding Lead (DSL)	13
6.0	Safeguarding Training and Updates for all team members	16
7.0	Roles and Responsibilities of Team Members	18
8.0	Safer Recruitment	21
9.0	Early Help	22
10.1	What to do if a pupil or student discloses	24
11.0	Managing Referrals to Disclosure and Barring Service (DBS) and professional bodies.....	25
12.0	Partnership working and sharing information	25
12.2	General Data Protection Regulations	Error! Bookmark not defined.
13.0	Child-on-child abuse	27
14.0	Bullying (Please also see the Anti-bullying Policy)	31
15.0	Preventative Strategies.....	32
16.0	Online Safety and Security.....	33
17.0	Children and young people who are absent from education	35
18.0	Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	36
19.0	Serious violence.....	Error! Bookmark not defined.
20.0	'Honour'-based abuse including FGM and Forced Marriage.....	38
22.0	Pupils and students requiring support with their Mental Health	40
23.0	Physical Interventions	42
25.2	The Headteacher, Principal or equivalent is the ultimate decision maker in respect of lowlevel concerns	44
26.0	Working with the Local Authority Designated Officer or local equivalent	45
27.0	Whistleblowing	45

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

28.0	Alternative provision and work experience placements	46
29.0	Digital and Remote Learning.....	46
30.0	Home visits	47
31.0	Policy Review	48

Safeguarding is everyone's responsibility

All team members who work directly or indirectly with children and young people in our schools and colleges have a responsibility to safeguard their welfare. The following people have specific additional responsibilities with regard to safeguarding and must work together to ensure a consistent approach across the school:

Designated Safeguarding Leads (DSL): Joshua Tuckey, Matt Ayling, Kevin Coakley,

Deputy Designated Safeguarding Leads (DDSL) : Ethan Tearle, Maressa Dunne

Headteacher/Principal or equivalent: Matt Ayling **Safeguarding Governor:** Nicola Mullarkey

Terminology - please note that the terms "our teams" and "team member/s" include everyone working with the people in Outcomes First Group's services in a paid or unpaid capacity, including employees, consultants, agency staff and contractors.

1.0 Policy statement

Syon Manor College is a specialist SEN setting and recognises that children and young people with special educational needs and disabilities may face additional barriers to recognising, reporting and responding to abuse, neglect and exploitation.

These barriers may include communication difficulties, limited verbal communication, differences in social understanding, reliance on adults or carers, difficulties in recognising unsafe behaviour, increased vulnerability to coercion or manipulation, social isolation, dependence on others for personal care, and difficulties distinguishing between appropriate and inappropriate relationships.

Staff must not assume that behaviour, communication differences, emotional dysregulation, sensory responses or changes in presentation are solely attributable to a child or young person's SEND, diagnosis or existing needs. Any significant change in presentation, behaviour, communication, relationships, attendance, personal care, physical condition or emotional wellbeing should be considered within a safeguarding context.

The College will make reasonable adjustments to enable young people with SEND to communicate concerns and participate in safeguarding processes. This may include the use of visual communication, communication aids, symbols, social stories, trusted adults, additional processing time, accessible language, alternative communication methods and other individualised approaches.

Staff must maintain professional curiosity and consider whether a child or young person's individual needs may increase their vulnerability to abuse, neglect, exploitation, bullying, discrimination, harmful sexual behaviour or online harm.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

Safeguarding responses will be adapted to the individual child's communication, cognitive, sensory, emotional and developmental needs while ensuring that these needs do not become a barrier to recognising or responding to safeguarding concerns.

Outcomes First Group is committed to ensuring that all the children and young people we educate and support are effectively safeguarded at all times. This policy sets out how children and young people in our schools and colleges will be safeguarded; it applies when working offline and online, at the educational setting, on visits and off-site activities, and in all virtual communications.

Safeguarding and child protection must always be the highest priority and at the forefront of everything we do. A whole school approach is essential to ensure these principles are embedded in all decisions, planning, policy and day-to-day operations and activities.

It is essential that everybody working within the Group understands their safeguarding responsibilities.

When carrying out our duties to safeguard and promote the welfare of children and young people, our schools and colleges will, at all times, have regard to [Keeping Children Safe in Education \(KCSIE\) 2026](#). This is the statutory guidance that sets out the legal duties that govern all schools and colleges in England educating children.

Where a school or college places a child or young person with an alternative provider, the school/college continues to be responsible for the safeguarding of that child/young person and should be satisfied that the placement meets their needs. Please see the Group's Alternative Provision (AP) Policy.

KCSIE 2026 must be read as follows:

- Governing bodies, proprietors and senior leaders must read the whole of KCSIE 2026.
- The Designated Safeguarding Lead and deputy Designated Safeguarding Lead(s) must read the whole of KCSIE 2026.
- All staff, including those who do not work directly with children and young people, must read and understand **Part One of KCSIE 2026**.
- The College will ensure that all staff have access to the safeguarding policy and to Part One of KCSIE 2026 as part of their induction and ongoing safeguarding arrangements.

Schools providing Early Years education have a duty to comply with the welfare requirements of the [Early Years Foundation Stage Framework \(EYFS\)](#) under [Section 40 of the Childcare Act 2006](#)

[Working Together to Safeguard Children](#) sets out what individuals, organisations and agencies must and should do to keep children and young people safe and emphasises that effective safeguarding is achieved by putting children and young people at the centre and by every individual and agency playing their part.

Schools and colleges should be aware of the [Children's Wellbeing and Schools Bill \(2024\)](#) that is currently progressing through parliament.

All team members working directly or indirectly with children and young people **must** ensure that:

- Children and young people feel safe and that they are listened to;
- they create an environment and culture in which children and young people feel valued;
- the best interests of the child or young person are always considered and acted upon;
- safer recruitment procedures (set out in our Safer Recruitment Policy) are rigorously followed;
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
- they understand that children and young people with special educational needs or disabilities (SEND), certain medical or physical health conditions can face additional safeguarding challenges both online and offline;
- they are vigilant in monitoring possible signs of abuse, neglect or exploitation including for those pupils/students who have complex learning difficulties or communication needs, who may be particularly vulnerable;
- they are aware that children and young people can abuse other children and young people i.e. child-on-child abuse).
- they maintain an attitude of **'it could happen here'**;
- they follow the appropriate procedures in place for sharing safeguarding concerns, including low-level concerns, and that these are shared with relevant professionals in a timely manner;
- they understand and implement local safeguarding procedures as set out in local authority arrangements;
- pupils and students learn about appropriate relationships with adults and their peers and recognise when other people's behaviour is unacceptable or inappropriate.
- There is a zero-tolerance approach to harassment, violence, abuse, inappropriate behaviour and bullying of any kind are not acceptable and will not be tolerated.

2.0 Local Arrangements for the school

2.1 All team members must be aware of the local arrangements for safeguarding relevant to the school or college in which they work;

2.2 The local arrangements for Syon Manor College are as follows:

2.3 Syon Manor College safeguarding arrangements are aligned with the Hounslow Safeguarding Children Partnership and the local multi-agency safeguarding arrangements. The statutory safeguarding partners are the London Borough of Hounslow, the relevant health partner and the Metropolitan Police Service. The College will work with relevant agencies in accordance with local safeguarding procedures and thresholds.

2.4 The Local Authority Designated Officer or local equivalent is Grace Murphy Tel: 0208 583 4933 Email: Grace.Murphy@hounslow.gov.uk (Working days: Wednesday to Friday) Sarah Paltenghi Tel:

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

0208 583 3423/ 07970198380 Email: Sarah.Paltenghi@hounslow.gov.uk (Working days: Monday to Wednesday)

2.5 All safeguarding referrals must be reported to the local authority SAAM Duty desk: 0208 583 5730 Email: Lado@hounslow.gov.uk Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the Adult safeguarding arrangements.

2.6 The local authority safeguarding referral procedure can be found [here](#):

<https://lbhounslow.sharepoint.com/sites/InternetLinks/fsd/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FInternetLinks%2Ffsd%2FShared%20Documents%2FHAF%2FHAF%20Providers%2FChild%20Protection%20flowchart%20September%202022%2Epdf&parent=%2Fsites%2FInternetLinks%2Ffsd%2FShared%20Documents%2FHAF%2FHAF%20Providers&p=true&ga=1>

2.7 For all referrals regarding radicalisation PreventCounterExtremism@hounslow.gov.uk

2.8 For all referrals regarding contact the [Hounslow Adult Social Care](#) team at **020 8583 3100** or adultsocialcare@hounslow.gov.uk. For young people, use **020 8583 6600 (option 2)** for out-of-hours concerns or **Peace@hounslow.gov.uk** for child criminal exploitation, while the [Modern Slavery Helpline](#) offers 24/7 confidential advice on **0800 0121 700**. In immediate danger, always call **999**.

2.9 The local authority procedure for an early help referral is call the London Borough of Hounslow on **020 8583 6600** or visit the relevant section of their website to start a request online. If you are a professional making a referral, use the [Early Help and Children's Social Care Portal](#). For urgent concerns about a child's immediate safety, you should use the same number, but follow specific options for reporting a concern or ask for the duty social worker if calling out of hours.

2.10 The Chair of Governors for Syon Manor College is: Nicola Mullarkey

2.11 The Group's Director of Safeguarding/Safeguarding Adviser can be contacted at: safeguarding@ofgl.co.uk

3.0 What is safeguarding and child protection?

3.1 Safeguarding

Safeguarding relates to the action taken to promote the welfare of children and young people to protect them from harm. This policy includes the safeguarding of young adult learners within our schools, colleges and other settings, and applies both offline and online.

Safeguarding is defined in [Working Together to Safeguard Children](#) as:

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes in line with the [Children's Social Care National Framework](#)

KCSIE 2026 applies to the College's safeguarding responsibilities in relation to children and young people under the age of 18.

Syon Manor College also has wider safeguarding responsibilities towards young adults aged 18 and over. Safeguarding concerns relating to adults will be managed in accordance with the relevant adult safeguarding legislation, local authority procedures, contractual requirements and Outcomes First Group policies.

Where a student transitions from child to adult safeguarding services, the College will ensure that relevant safeguarding information is shared appropriately, and that continuity of support is maintained.

3.2 Contextual Safeguarding

We adopt a contextual safeguarding approach to safeguarding and child protection. Contextual safeguarding is: '...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.' (Dr Carlene Firmin)

3.3 Child Protection

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

3.4 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, we believe that safeguarding is everyone's responsibility. The Group expects that, without exception, team members keep children and young people at the centre of all that they do and that any actions taken

are in the best interests of the child or young person. We also expect that children and young people are listened to, and their voices are always heard.

3.5 Defining Significant Harm/Child Abuse

3.5.1 The [Children Act 1989](#) introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under [Section 47](#) of the Act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

3.5.2 Under [Section 31](#) of the Children Act as amended by [Adoption and Children Act 2002](#):

'harm' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;

'health' means physical or mental health; and

'ill-treatment' includes Sexual Abuse and forms of ill-treatment which are not physical. Abuse or neglect is not always easy to identify; team members are more than likely to have some information but not the whole picture.

3.5.3 There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm':

- Neglect
- Physical Abuse
- Emotional Abuse
- Sexual Abuse.

3.5.4 It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children and young people are at risk of abuse, exploitation and harm online as well as face to face. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life.
- children and young people can abuse other children and young people (child-on-child abuse), this can happen both inside and outside of school and online.

3.5.5 'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives including their peers, in their community and/or online. These threats can take a variety of different forms, including sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' ([Working Together to Safeguard Children](#))

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

Somebody may abuse, neglect or exploit a child or young person by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children and young of all forms of domestic abuse, including where they see, hear or experience its effects. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child/young person or children/young people. ([KCSIE 2026](#))

All team members must be aware of the signs and indicators of child abuse (Please see 7.6 for further information)

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

4.0 The role of governors, the proprietor and senior managers

4.1 Governing bodies and proprietors have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must read the whole [KCSIE 2026](#) guidance document and have regard to it at all times, ensuring policies, procedures and training in their schools are effective and comply with the law at all times. They must have oversight of the safeguarding policies and procedures and ensure that they are being effectively implemented within the school and that training is effective.

As with all team members, Governors must be safely recruited and have all relevant checks on file. Please refer to section 8.0 of this policy and see the Group's Safer Recruitment Policy for further information.

4.2 Governing bodies and proprietors should:

- Have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools safeguarding arrangements'. The named Governor for the school is Nicola Mullarkey.
- Ensure that the school contributes to multi-agency working in line with [Working Together to Safeguard Children](#)
- Be aware of the local multi-agency safeguarding arrangements
- Receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- As part of the whole school safeguarding approach, they must create a culture that safeguards and promotes the welfare of children and young people in their school or college. This includes ensuring that robust recruitment procedures are in place that deter and prevent people who are

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

unsuitable to work with children and young people from applying for or securing employment opportunities in schools. (Please see the Group Safer Recruitment Policy)

- Be responsible for ensuring an appropriate senior team member, from the school leadership team, is appointed to the role of **designated safeguarding lead (DSL)**. With the support of governors, proprietors and senior leaders, the DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). **This should be explicit in the role-holder's job description.**
- Be aware of their obligations under the [Human Rights Act 1998 \(HRA\)](#) and the [Equality Act 2010](#), which require schools to:
- Act in a way that respects and protects an individual's human rights when they make individual decisions about them. In particular, the right to: education, freedom from inhuman and degrading treatment, and respect for private and family life. These rights must be protected and applied without discrimination.
- Carefully consider how pupils and students are supported with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. Proportionate positive action can be taken to deal with particular disadvantages affecting those with a protected characteristic to meet their specific need. This includes a duty to make reasonable adjustments for disabled pupils and students and those with long term conditions.
- Guidance to help schools understand how to fulfil their duties under the [Equality Act \(2010\)](#) is available on the DFE website: [Advice for schools](#)
- Ensure that pupils and students are taught about how to keep themselves and others safe, including online. This education should be tailored to the specific needs and vulnerabilities of individual pupils and students.
- Do all that they reasonably can to limit pupils and student's exposure to online risks from the school or college system, including:
- Ensuring the school has appropriate filters and monitoring systems in place, that are informed in part by the risk assessment required by the [Prevent Duty](#), and that their effectiveness is regularly reviewed.
- Work closely with senior leaders, the DSL and IT service providers in all aspects of filtering and monitoring.
- Ensuring that the school leadership team and relevant team members have an awareness and understanding of the appropriate online filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Consider the age range and developmental age of their pupils/students, the number of pupils /students and their needs, how often they access the IT system and the proportionality of costs verses safeguarding risks.
- Adhere to the DFE guidance [Meeting digital and technology standards in schools and colleges](#) that requires schools to:
 - identify and assign roles and responsibilities to manage filtering and monitoring systems.
 - review filtering and monitoring provision at least annually.
 - block harmful and inappropriate content without unreasonably impacting teaching and learning.
 - have effective monitoring strategies in place that meet their safeguarding needs
- Review the standards and discuss with IT and service providers what more needs to be done to support schools and colleges in meeting this standard.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- The DFE's [Plan technology for your school](#) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

[Cyber security standards for schools and colleges](#) can be found here and broader guidance on cyber security including considerations for governors and trustees can be found at [Cyber security training for school staff - NCSC.GOV.UK](#)

The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

- 4.3** Where there is a safeguarding concern, governing bodies, proprietors and school leaders should ensure the child/young person's wishes and feelings are taken into account when determining what action to take and what services to provide. This has to be balanced with their duty to protect the victim and other children.
- 4.4** Where the school premises are used for non-school activities and the services or activities are provided under the direct supervision or management of the school, the schools arrangements for child protection and safeguarding apply. Where service or activities are provided by another body, the school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure they will liaise with the school on these matters as appropriate. This applies regardless of whether or not the children and young people who attend any of these services or activities are pupils or students on the school roll or college roll.

The governing body or proprietor should also ensure safeguarding requirements are included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

DFE guidance on [Out-of-school settings: safeguarding guidance for providers](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

[Using after-school clubs, tuition and community activities](#) provides information for providers, parents and carers.

In the event of an allegation being received relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children. As with any safeguarding allegation, the school should follow the safeguarding procedures set out in this document, including informing the Local Authority Designated Officer or local equivalent, where appropriate.

5.0 Designated Safeguarding Lead (DSL)

5.1 With the support of the governing body and proprietor, the Headteacher, Principal or equivalent must appoint one individual to be the lead DSL and make arrangements for there to be a deputy DSL who will manage any immediate safeguarding incidents in the DSL's absence. The DSL must be an appropriate senior member of the leadership team and, along with deputies, will receive DSL training every two years.

5.2 The Headteacher, Principal or equivalent must ensure that job descriptions for the DSL and Deputy DSL are kept on personnel files and clearly state their responsibilities.

5.3 The DSL (or deputy) must always be available during school hours for team members to discuss any concerns.

5.3A DSL cover arrangements

The College will maintain robust and clearly communicated arrangements for safeguarding cover whenever the DSL is unavailable due to illness, leave, training, meetings or other circumstances.

Staff will always know who they should contact when the DSL is unavailable. The Deputy DSLs will provide safeguarding cover in accordance with the College's agreed arrangements.

Where appropriate, the College will maintain a confidential safeguarding communication system, such as a shared safeguarding mailbox or equivalent secure system, to ensure that safeguarding concerns can be received, monitored and acted upon without delay.

Safeguarding cover arrangements will apply during the College Day and, where relevant, during educational visits, work experience, residential activities and other College-organised activities taking place outside normal hours.

5.4 The main responsibilities of the Designated Safeguarding Lead (DSL) are to:

- provide support to team members regarding safeguarding concerns
- lead on advising team members of any action to be taken due to a safeguarding concern
- ensure that children and young people are immediately safeguarded from harm and abuse
- ensure that there is appropriate cover during their absence, and that team members know who to approach if the DSL is unavailable

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries
- adopt a child-focused and holistic approach ensuring the child/young person's wishes and feelings are considered when determining what action to take
- refer allegations to the Local Authority Designated Officer or local equivalent
- refer safeguarding concerns to placing and host local authorities
- refer suspected cases of radicalisation to Channel
- refer suspected case of FGM, Child Sexual Exploitation and trafficking to the police
- refer cases to the Disclosure and Barring Service after team members have been dismissed or there is suspected harm having been caused to a child
- liaise with the Director of Safeguarding/ Safeguarding Adviser and HR Team if any allegations or suspected harm having been caused to a child by a team member
- ensure that the school complies with the work of the local safeguarding partnership
- ensure that all team members receive regular update training in relation to safeguarding
- provide safeguarding updates to senior managers and school governors
- keep the Headteacher, Principal or equivalent informed of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children and young people to have an Appropriate Adult (See [PACE Code C 2019](#) and DFE Guidance, [3, Screening and Confiscation](#) for further information)
- ensure that there is effective monitoring and oversight of all safeguarding concerns;
- promote the educational achievements of Looked After Children in line with the [Children and Social Work Act 2017](#)
- have details of the social worker for any looked after children and the name of the virtual school head in the relevant authority for any children/young people with a social worker or previously looked after child.
- Work closely together with IT Services and providers to meet the needs of the school and requesting system specific training and support as and when required.
- Take lead responsibility for any safeguarding and child protection matters that are picked up through web filtering and monitoring systems in place, (Please see Web Filtering and monitoring Policy). This includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checks to the filtering and monitoring systems
- Investigate any attempted access of inappropriate sites as soon as possible and take appropriate action; and refer appropriately any attempted access of websites related to extremism under Prevent duties and local arrangements for reporting
- have a thorough knowledge and understanding of the full [KCSIE 2026](#) guidance.
- have a detailed understanding of the specific safeguarding vulnerabilities and additional barriers faced by children and young people with SEND, including communication difficulties, cognitive differences, dependence on adults, vulnerability to grooming and exploitation, and increased online risks;
- understand the impact of trauma and adversity on behaviour, mental health, wellbeing and educational outcomes;
- ensure safeguarding responses are appropriately adapted to individual communication, sensory, cognitive and developmental needs;
- work closely with the member of staff responsible for SEND and relevant clinical and pastoral professionals to ensure safeguarding concerns are considered holistically.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

5.5 It is important that all team members understand the role of the DSL on their appointment within the school and as part of their induction. The DSL is responsible for ensuring that all team members understand their roles and responsibilities regarding safeguarding children and young people that a child-focused approach is taken. The DSL will assess safeguarding concerns within the context of the child/young person's environments in line with our contextual safeguarding approach.

5.6 The DSL must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns, including low-level concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each pupil/student. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, team members should discuss with the DSL (or deputy).

Safeguarding records must be clear, factual and contemporaneous. Records should distinguish, wherever possible, between:

- information directly observed or reported;
- professional opinion or analysis; and
- historic information.

Where appropriate, records should identify the current level of safeguarding concern, relevant context, actions taken, decisions reached, the rationale for those decisions and the outcome.

Where a child or young person transfers to another setting, safeguarding information should be transferred securely and promptly. Where appropriate, the College should provide a clear and structured summary identifying current safeguarding concerns, relevant context and ongoing support needs, rather than relying solely on the transfer of extensive historical records.

5.7 Data protection and GDPR are not barriers to record keeping or information sharing when promoting a child's welfare. Schools have clear powers to share, hold and use information for these purposes. The school should have clear arrangements in place for the processes and principles for sharing information within the school, with other divisions within the Group and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required. Team members are required to be proactive in sharing information as soon as possible when it is in relation to a child's safety or wellbeing.

5.8 When pupils/students leave the school or college, the DSL is responsible for ensuring that the necessary information is shared with the new school or college. It is the DSL's responsibility to

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

ensure that the pupil's/student's child protection file is transferred to the new school or college as quickly as possible and as securely as possible. This should be within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child/young arrives.

Files must be transferred securely; the child protection file should be transferred separately from the main pupil /student file. Confirmation of receipt must be obtained. Schools must inform their Local Authority of all deletions from their admission register when a pupil of compulsory school age is taken off roll.

Where a child or young person transfers to another school, college or educational setting, the College should ensure that relevant safeguarding information is actively considered and shared where this will support effective safeguarding.

The transferring College should provide a structured summary of current safeguarding concerns, relevant context and ongoing support needs where appropriate. Particular care should be taken to distinguish current concerns from historic information.

Where appropriate, the DSL should consider whether additional safeguarding information should be shared in advance of the child's transfer, particularly where this information may assist the receiving setting to assess risk, provide appropriate support or safeguard other children and young people.

The College should, where appropriate, communicate directly with the receiving setting's DSL and, where relevant, the SENCO or named person with oversight for SEND, to ensure that key safeguarding risks, communication needs and support arrangements are understood.

6.0 Safeguarding Training and Updates for all team members

6.1 As part of the training for team members and to ensure children and young people are taught about safeguarding, governing bodies and proprietors should ensure that safeguarding training is integrated, aligned and considered as part of the whole-school safeguarding approach, wider training and curriculum planning. They must regularly review the training programme to ensure that it includes all required knowledge and that team members understand how it is to be implemented.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils and students.

6.2 All team members are expected to follow this policy and related statutory guidance.

6.3 All team members must read the following documents:

- Part 1 of [KCSIE 2026](#)

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

The colleges:

- Attendance Policy
- Positive behaviour management Policy
- Anti-bullying policy
- Low level concerns Policy
- Child-on-child abuse Policy and Harmful Sexual Behaviour Guidance
- Child Exploitation policy
- Protecting Children & Young People from Radicalisation policy
- Web Filtering and Monitoring policy
- Mobile and Smart Technology Policy
- Medication Policy
- Description and guidance of the role of the DSL and the role of the Deputy DSL

The Group's:

- Group Safeguarding Statement
- The Use of Restrictive Practices and Restraint Terms of Reference
- Suspension and Permanent Exclusion Policy
- Searching, Screening and Confiscation Policy
- Safer Recruitment policy
- Managing Allegations Against An Employee
- Data Protection policy
- Staying Safe Online
- AI Policy
- Gaming Devices Best Practice Guidance
- Whistle blowing and complaints policy
- Code of Conduct & Ethics Policy
- Photography of Injuries and Medical Conditions Policy
- Serious Incident Escalation Policy
- Educational Visits & Activities Policy
- Alternative Provision Policy
- Work Experience Policy
- Group Supervision Policy

Team members should also be aware of the following DFE Guidance:

- [Working Together to Safeguard Children](#)
- [Sexual violence and harassment between children in schools and colleges](#)
- [Working together to improve school attendance](#)
- [Children Missing in Education](#)
- [Promoting the Education of Looked After Children](#)
- [Teaching Online Safety in Schools](#)
- [Sharing nudes and semi-nudes: advice for education settings](#)
- [Searching, Screening and Confiscation](#)
- [Harmful Online Challenges and Online Hoaxes](#)
- [Preventing and tackling bullying](#)
- [Mental health and wellbeing support in schools and colleges](#)

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- [Behaviour in schools: advice for headteachers and school staff](#)
- [SEND code of practice: 0-to-25 years](#)
- [Information Sharing: Advice for practitioners providing Safeguarding Services](#)

CSA Centre also provides resources to [Help education setting identify and respond to concerns](#)

6.4 The School/College will provide regular safeguarding updates to staff, either through face-to-face training, meetings or through regular written updates.

All team members must complete the mandatory training:

- Introduction to Safeguarding (e-learning) to be completed within the first week of employment.
- Safeguarding Children Foundation within three months of employment.
- The annual KCSIE e-learning course that provides updated statutory information and requirements that all education team members must be aware of.

A line manager competency check must be completed annually (via competency check on Shine) in the years in between the formal safeguarding course. If there are any concerns regarding competency or knowledge the team member will be referred to complete a refresher or original safeguarding course.

DSLs (and their deputies) must refresh their advanced training **at least every two years.**

If a service has a specific need or issue in relation to Safeguarding, then they can request a closed virtual or closed face-to-face course to support with the need.

6.5 All members of school leadership teams, including the Headteacher, Principal or equivalent and DSL should also be familiar with [Working Together to Safeguard Children](#)

7.0 Roles and Responsibilities of Team Members

7.1 The Group recognises that it is not just one person's role to safeguard children and young people. It requires a collective approach to safeguarding. All employees must understand their roles and responsibilities regarding keeping children and young people safe and reporting concerns.

7.2 During induction, team members will receive safeguarding training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Team members must be familiar and understand the role of the DSL, the local safeguarding partnership and the individual systems relating to safeguarding within the school. Team members must also know, understand and implement the school's behaviour management policy, the Group's Code of Conduct & Ethics and the safeguarding response to pupils and students who are absent from education or are missing from education [KCSIE 2026](#)

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

7.3 Team members are responsible for:

- compliance with the Group's policies, statutory guidance and legislation including [KCSIE 2026](#)
- and [Working Together to Safeguard Children](#)
- understanding the role of the DSL;
- attending training and meetings;
- helping to develop and deliver a curriculum which helps children and young people to understand about abuse, neglect and exploitation appropriate and safe relationships with adults and other children and young people, and keeping safe both online and offline;
- helping to provide an environment where children and young people feel safe and valued; • ensuring they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to pupils and students absent from school or missing from education;
- listening to pupils and students;
- supporting pupils and students if they disclose safeguarding information;
- ensuring that they are alert to signs of abuse and exploitation by other children, young people and adults and aware of indicators or possible signs of neglect;
- ensuring that they closely monitor any possible signs of abuse and harm for those pupils and students who are unable to communicate verbally or who have complex health and care needs;
- keeping sensitive information confidential and sharing it only with professionals for whom it is relevant;
- helping to identify those pupils and students who may benefit from Early Help;
- helping to implement Child Protection Plans.

7.4 Team members are in a close position to children and young people within schools and colleges and have regular contact with them, so are in the best position to know if a child is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, no matter how small they may seem, must be reported immediately to the DSL both verbally and in writing. **It is the team member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.**

7.5 All team members should be aware that a pupil/student may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Team members must maintain professional curiosity and be alert to changes in a child or young person's behaviour. Team members must speak to the DSL if they have any concerns about a pupil or student. It is also important that team members determine how best to build trusted relationships with pupils/students to facilitate communication.

7.6 Some common signs team members should be alert to that may indicate something concerning may be happening in a child or young person's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn or seeming anxious
- becoming uncharacteristically aggressive

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- lacks social skills and has few friends if any
 - poor bond or relationship with a parent
 - knowledge of adult issues inappropriate for their age
 - running away or going missing
 - always choosing to wear clothes which cover their body
- (Please see: [NSPCC: Spotting the Signs of Child Abuse](#))

These signs do not necessarily mean that a child or young person is being abused, there could be other things happening in their life which are affecting their behaviour. Team members should discuss any concerns with the DSL.

For children and young people with special educational needs or disabilities (SEND), and multiple complex co-occurring needs, it can be difficult for team members to distinguish between signs of abuse and behaviour that is part of the child or young person's condition. Team members should be alert to **changes** in their behaviour and always consider all possible causes of this. Please also see:

[Children with disabilities - Safeguarding our most vulnerable](#)

[NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#)

[NSPCC - Safeguarding Deaf and disabled children and young people](#)

7.7 Being Lesbian, gay, bisexual transgender, queer, questioning and/or ace (LGBTQ+) is not in itself an inherent risk factor for harm. However, pupils/students who are LGBTQ+, or are perceived to be LGBTQ+, can be targeted by other children and young people. Risks can be compounded where pupils/students who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that team members endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with team members.

Please note: The DfE refers to 'LGBT' in its guidance. We have chosen to use the term 'LGBTQ+', because this abbreviation appears to be most inclusive and commonly used by the community.

7.8 Looked after children and previously looked after children can potentially remain vulnerable and all team members should have the skills, knowledge and understanding to help keep them safe. It is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

7.9 If the school/ college becomes aware that a child or young person under the age of 18 is subject to a private fostering arrangement, the local authority must be informed so they can assess and support them to ensure it is a safe place for the child. Private foster carers are people who are not a close relative to a child but plan to look after them for 28 days or more. Team members should inform the DSL immediately if they become aware of a private fostering arrangement.

7.9 Team members should be aware that children and young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

in their own intimate relationships as teenagers. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

The Headteacher, Principal or equivalent and DSL should be familiar with [Operation Encompass](#) which enables schools and police to work together to provide emotional and practical help to pupils and students, where police have been called to an incident of domestic abuse in the household.

7.10 The school/college must ensure that pupils know:

- how to report any concerns and feel confident that they will be listened to and supported.
- They can also report any concerns by emailing tellus@ofgl.co.uk, which is monitored by the Quality Team.
- Are aware they can contact the NSPCC dedicated helpline on **0800 136 663** or by emailing help@NSPCC.org.uk
- Are aware of how to contact Childline (**0800 1111**)

7.11 Team members are not permitted to use personal mobile phone devices, cameras or digital recording devices at any time during operational hours within the school. Team members should be supported to safely store away their personal devices during these times in a lockable personal storage area, with personal keys provided to each team member.

Team members are advised if they wish to take their personal devices out of storage, they are only permitted to do so during their designated break times, with the restriction of only doing so in the designated team members room area. Company devices will be provided as and where appropriate to support team members to capture images of any Learning & Development within the school. Visitors will also be made aware of the requirement for them to adhere to this procedure when arriving to site and undergoing the visitor sign in process.

8.0 Safer Recruitment

8.1 The Group's Safer Recruitment Policy sets the processes which must be followed for the recruitment of team members, which includes the requirement for enhanced DBS and other checks. The Resourcing Team will add a statement to all vacancy adverts to inform candidates that online searches are done as part of due diligence for shortlisted candidates.

8.2 It is the responsibility of the Headteacher, Principal or equivalent to ensure that the Single Central Record is compliant with legislation and statutory guidance and kept up to date and is stored confidentially.

8.3 It is the responsibility of the hiring manager at the school to ensure that copies of the documents used to verify the successful candidate's identity, right to work, required qualifications and references should be kept on their personnel file. The Headteacher, Principal or equivalent and

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

Safeguarding Governor should conduct regular audits to assure themselves that the correct documents are in place and stored safely.

8.4 Regulated activity and volunteers

The College will apply the current KCSIE 2026 requirements when determining whether staff, volunteers, contractors or other individuals are undertaking regulated activity with children.

Following changes introduced by the Crime and Policing Act 2026, the previous supervision exemption for regulated activity has been removed. The College will therefore assess regulated activity based on the duties and frequency of the role rather than relying solely on whether an individual is supervised by another member of staff.

A volunteer undertaking teaching, training, instructing or supervising children on more than three days in any 30-day period or overnight will fall within regulated activity and the appropriate enhanced DBS check with children's barred list information will be obtained before they undertake that activity, where required by law.

The College will ensure that DBS and other pre-employment checks are appropriate to the role being undertaken and will maintain the required records on the Single Central Record.

The College will also ensure that any changes to regulated activity requirements are reflected promptly in recruitment and volunteer procedures.

Schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. If they do retain them there must be a valid reason for doing so and it should not be kept for longer than six months as they are covered by UK GDPR/DPA 2018 Article 10.

9.0 Early Help

9.1 'A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989' ([KCSIE 2026](#))

9.2 Early Help and Family Help

Team members must take swift and effective action to safeguard children and young people and prevent concerns from escalating. Children and families may benefit from support through universal services and community-based Early Help or, where appropriate, targeted Family Help.

All team members should understand the local arrangements and thresholds for accessing Early Help, Family Help and statutory children's social care services. The DSL will consider the child's individual

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

circumstances, level of need, wishes and feelings, and the potential impact of SEND, disability, health needs, communication difficulties and other vulnerabilities when determining the appropriate safeguarding response.

Where support is provided through Family Help or another early intervention pathway, the College will continue to monitor the young person's circumstances and consider escalation to social care where the situation does not improve, deteriorates or reaches the threshold for statutory intervention.

9.3 Team members must be aware and alert to the possibility of Early Help being needed for those pupils and students who have particular vulnerabilities, such as those who:

- are disabled or have certain health conditions and specific additional needs
- have special educational needs (whether or not they have a statutory EHCP)
- are suffering from mental ill health
- are frequently missing/goes missing from education, home or care
- are persistently absent from school, including persistent absences for part of the day, or not in receipt of full-time education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are at risk of modern slavery, trafficking, sexual or criminal exploitation, of being radicalised or exploited
- are in a family circumstance presenting challenges, such as drug and alcohol misuse, adult mental health issues, domestic abuse; a family member is in prison, or is offending
- are misusing drugs or alcohol themselves
- have returned home to their family from care
- are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- are privately fostered
- are pregnant and/or are parents themselves;
- have exhibited early signs of abusive, violent or harmful behaviour;
- are subject to a part-time timetable or are repeatedly removed from the classroom;
- are experiencing additional vulnerability because of communication difficulties, cognitive impairment, sensory needs or other aspects of their SEND.
- are young carers or have significant caring responsibilities within their family.

The College will consider the impact of caring responsibilities on attendance, emotional wellbeing, educational engagement, physical health and safeguarding.

9.5 Social care assessments should also consider where the child/young person is being harmed in contexts outside the home. It is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- 9.6** When a pupil/student has been referred for Early Help, it is the responsibility of the DSL to set up an inter-agency assessment as appropriate. Team members may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration must be given to a referral to children's social care for assessment for statutory services if the pupil's/student's situation does not appear to be improving or is getting worse.

10.0 Reporting concerns

10.1 What to do if a pupil or student discloses

Well promoted, easily understood and easily accessible systems should be in place for pupils and students to confidently report abuse, neglect, exploitation, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a pupil/student discloses information to a team member, the team member must ensure that they:

- listen to the pupil/student and reassure them they are being taken seriously and that they will be supported and kept safe.
- never give them the impression they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment. They must never be made to feel ashamed for making a report.
- do not dismiss what the pupil/student tells them. All concerns must be acted upon rigorously;
- do not promise to keep it a secret. The team member must explain that they have a duty to share information to keep them safe and protect them;
- write down what the pupil/student tells them. This must be accurate and in the pupil's/student's words;
- immediately report the concerns to the DSL or deputy. If neither is available, the member of team member must report the information to the Headteacher, Principal or equivalent or Regional Director.

- 10.2** Team members must be alert to not just potential familial abuse and allegations, but also to pupils and students making allegations against team members or other children. In these situations, the Group's Managing Allegation Procedures must be followed. (See Section 24 for further details).

- 10.3** All concerns, however small they may seem, **must** immediately be reported to the DSL. This must be done verbally and then followed up **on the same day** and documented on the school's electronic recording system. The team member has a responsibility to ensure that action has been taken about the concern on the **following day**, and that the concern is documented on the system. If action is not taken in a timely way as the team member sees fit, they have a duty to escalate their concerns to the Headteacher, Principal or equivalent or Regional Director.

10.4 Team members must prioritise the pupil's/student's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DSL or deputy, they must not share it with anyone else.

10.5 On receipt of the information, the DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director, and where relevant, the Local Authority Designated Officer or local equivalent.

11.0 Managing Referrals to Disclosure and Barring Service (DBS) and professional bodies

11.1 As a result of an allegation or investigation a referral may be required. This can include referrals to Disclosure and Barring Service, Disclosure Scotland, Social Work England, Scottish Social Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), Teacher Regulation Authority/ General Teaching Council for Scotland (GTCS).

11.2 The Headteacher, Principal or equivalent of the school is responsible for making the referral at the appropriate time. The timing of the referral can vary by nation and by the severity of the concern. The Headteacher, Principal or equivalent must be familiar with, and follow, the national requirements and make the referral at the appropriate time.

11.3 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made. **It is an offence in all UK nations not to make a referral to the appropriate disclosure body.**

11.4 If a referral is made, at the point of completion the Headteacher, Principal or equivalent must notify safeguarding@ofgl.co.uk and the Human Resources Advisor peopleadvice@ofgl.co.uk of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.

11.5 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure Scotland must be made.

11.6 Where a teacher is dismissed or their services are no longer used because of serious misconduct, or might have been dismissed, or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

12.0 Partnership working and sharing information

12.1 Partnership working and the sharing of information is key in keeping children and young people safe. Everyone who has a role to play in caring for children and young people has a duty to share good quality information with the relevant professionals in a timely manner.

12.2 Data Protection and Information Sharing

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

The College will comply with applicable data protection laws, including the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

Data protection legislation must not be used as a barrier to appropriate safeguarding information sharing. Information should be shared where there is a lawful basis and where doing so is necessary to safeguard and promote the welfare of a child or young person.

Staff should share information promptly with the DSL and other relevant professionals where this is necessary to protect a child. Consent should not be treated as a requirement where there is another lawful basis for sharing information and seeking consent would place a child at increased risk or cause delay in safeguarding action.

When deciding whether information should be shared, staff and DSLs should consider the purpose of the information sharing, what information is necessary and proportionate, who needs the information, the potential benefits and risks of sharing, and whether the information can be shared safely.

The rationale for significant information-sharing decisions should be recorded.

All schools must ensure that they comply with the Group's Data Protection Policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to pupil's/student's personal information, as well as that of team members and parents/carers.

GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child or young person provided that there is a lawful basis to process any personal information required.

Information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a child or young person in a timely manner. It is legitimate to share information without consent where:

- it is not possible to gain consent;
- the school cannot reasonably be expected to gain consent; and
- if to gain consent would place a child or adult at risk.

Where there is any doubt, the DSL should contact the Group's Legal Team for clarification.

All team members must complete the GDPR training and have a responsibility to ensure that they comply with the GDPR requirements.

- 12.3** Schools/ colleges must ensure that they inform pupils and students, parents and carers of how their personal information will be stored and used. The following guidance is recommended for education team members: [Data Protection in schools](#)

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- 12.4** Schools and colleges must ensure that they hold emergency contact details of the parents/carers of pupils and students. This is to be done with the agreement of the parents/carers. In line with [KCSIE 2026](#) schools and colleges must hold more than one set of contact details for each pupil/student, where reasonably possible.
- 12.5** Data breaches must be reported immediately to Group's Data Protection Officer as set out in the Group's Data Protection Policy.

Please also see:

[Information Sharing Advice for Safeguarding Practitioners](#) (Please that this advice is currently under revision, an updated draft is being consulted on: [DRAFT Information Sharing Advice](#))

[Improving multi-agency information sharing \(publishing.service.gov.uk\)](#)

13.0 Child-on-child abuse (including harassment and violence)

- 13.1** All team members should be aware that children and young people can abuse other children and young people (often referred to as child-on-child abuse), children and young people of differing ages, as well as similar ages, can abuse one another.

Local Safeguarding procedures must be followed, and any incidents of sexual violence will be reported to the police. Schools should be part of discussion with statutory safeguarding partners.

Child-on-child abuse is a safeguarding issue for both the child or young person who has experienced harm and the child or young person who has displayed harmful behaviour. The College will consider the safeguarding needs, vulnerabilities and circumstances of all children involved.

Harmful behaviour may be influenced by a child's own experiences of abuse, neglect, exploitation, trauma or other vulnerabilities. Children and young people who display harmful behaviour may themselves require safeguarding support.

Child-on-child abuse can involve serious physical harm, threats of violence or the use or threat of weapons, as well as sexual violence, sexual harassment, bullying, coercive or controlling behaviour, harmful sexual behaviour and online abuse.

The College will not dismiss harmful behaviour as "banter", "just having a laugh", "part of growing up" or similar. All concerns will be taken seriously and responded to proportionately, taking account of the age, developmental stage, communication needs, SEND, capacity to understand, context and individual circumstances of the children involved.

- 13.2** It is essential that all team members understand that abuse is abuse and the importance of challenging inappropriate behaviours between pupils and students. Team members should

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

familiarise themselves with the **Child-on-Child Abuse Policy and Sexually Harmful Behaviour Guidance**.

Team members must recognise that harmful or abusive behaviour between pupils and students must never be dismissed or minimised as “banter”, “just having a laugh”, “part of growing up” or similar. Such attitudes can contribute to an unsafe culture in which harmful behaviour becomes normalised, and pupils/students may be less likely to report concerns.

All concerns relating to child-on-child abuse, including sexual harassment, sexual violence, bullying, discriminatory behaviour, harmful sexual behaviour and online abuse, must be taken seriously and responded to in accordance with the College's safeguarding procedures.

Staff must consider the individual circumstances of the pupils/students involved, including their age, developmental stage, SEND, communication needs, understanding of relationships and consent, and any relevant vulnerabilities or previous experiences of abuse or trauma.

- 13.3** Team members must ensure that they create a school/college environment where pupil/student safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Team members must be aware and alert to incidents of online abuse between children, consensual and non-consensual sharing of nude and semi-nude images, sexual violence and sexual harassment between pupils/students and bullying.

This includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Team members must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.

- 13.4** All team members should understand that even if there are no reports in their schools, it does not mean it is not happening, it may be the case that it is just not being reported. Team members are advised to maintain an attitude of '**it could happen here**' and be vigilant to any signs.

- 13.5** It is important that team members are aware that pupils/ students may not find it easy to tell an adult about their abuse. Pupils and students can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a team member may overhear a conversation that suggests a pupil/student has been harmed or a pupil's or student's own behaviour might indicate that something is wrong. If team members have any concerns about a pupil's welfare, they should act on them immediately rather than wait to be told. **Team members must act immediately and report any concerns regarding child-on-child abuse to the DSL.**

Children and young people may also cause harm to parents or carers, sometimes referred to as child-to-parent or child-to-caregiver abuse. Where such behaviour indicates that a child or another member of the family may be at risk of harm, staff should consider the circumstances within a safeguarding context and refer concerns to the DSL.

13.6 It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

13.7 Team members should explain to pupils and students in an appropriate way that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, e.g. sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent,
- consensual and non-consensual sharing of nude and semi-nude images and or videos • upskirting
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group)

These forms of abuse can happen inside or outside of school both offline and online.

This includes the making, sharing or distribution of nude or semi-nude images or videos, including self-generated images and/or images created, altered or generated using artificial intelligence, including deepfakes or deep nudes.

13.10 A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Team members must challenge any gender bias or derogatory language used by team members or pupils/students. Team members must not dismiss any concerns brought to them by pupils/students. Team members can report concerns verbally, but they must ensure that all concerns are recorded onto the school's electronic recording system by the end of the school day.

13.10A Misogyny and misandry

The College recognises that misogynistic and misandrist attitudes, language and behaviours can contribute to an unsafe environment and may be a safeguarding concern where they affect the welfare, safety or dignity of pupils/students or contribute to harassment, abuse, violence, intimidation or discriminatory behaviour.

Team members must challenge misogynistic, misandrist, sexist or gender-based derogatory language and behaviour appropriately and consistently. This includes language or behaviour expressed in person, online, through social media, messaging platforms, gaming or other digital environments.

Staff should remain alert to the potential links between misogynistic attitudes, harmful sexual behaviour, sexual harassment, online radicalisation, extremism and other forms of abuse or exploitation.

Where such behaviour is persistent, escalating or forms part of a wider pattern of harmful behaviour, it should be reported to the DSL and recorded in accordance with the College's safeguarding procedures.

For pupils/students with SEND, staff should consider whether communication difficulties, social understanding, vulnerability to influence or difficulty recognising inappropriate behaviour may affect how misogynistic or gender-based content is understood, repeated or experienced. Appropriate reasonable adjustments and targeted support should be considered.

[Shore Space](#) is an online resource developed by the Lucy Faithfull Foundation in collaboration with the Home Office, offering a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

- 13.11** It is also important to understand intra familial harms and any necessary support for siblings following incidents, this applies whether siblings attend the same or a different school.
- 13.12** When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour.

Schools must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

- 13.13** DSL must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.
- 13.14** The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

13.15 Where the DSL believes that there has been significant harm caused to the pupil, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

If the local authority does not believe it meets their threshold for further action and the DSL is not in agreement, this must be challenged with the local authority.

13.16 After the outcome/conclusion of the incident:

- a contextual safeguarding approach must be taken;
- schools must take all necessary action to learn from the incident and prevent future incidents occurring, such as through targeted education around specific types of child-onchild abuse;
- support for the victim must be offered and provided where possible. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- schools must ensure that they **do not** adopt a victim blaming approach;
- the DSL must complete an investigation into the incident; The investigation must consider the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment must be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils and students.

14.0 Bullying (Please also see the Anti-Bullying Policy)

The College recognises that racism, prejudice-based bullying, discriminatory behaviour, derogatory language and other forms of identity-based harm are safeguarding concerns where they affect a child's welfare or safety. Staff must challenge such behaviour consistently and report concerns in accordance with safeguarding and behaviour procedures.

14.1 Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children and young people should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'.

14.2 The Group has a zero-tolerance approach to bullying. Team members must help pupils and students to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Team members must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

14.3 Schools have a responsibility to ensure that those pupils/students who bully, are supported and helped to understand the impact of their actions.

14.4 Please see the following government guidance on preventing and tackling bullying in schools:
[Preventing and tackling bullying](#) , [Mental health and behaviour in schools](#)
[Behaviour in schools: advice for headteachers and school staff](#)
 See [Rise Above](#) for links to materials and lesson plans

15.0 Preventative Strategies

15.1 It is important that pupils/students are taught about how to keep themselves and others safe, including online. This preventative education will be effectively tailored to the specific needs and vulnerabilities of individual pupils /students.

For pupils and students who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care and education. The support required must be tailored to the individual pupil's/ student's needs and be included in their Care Plan.

15.2 The school will take all appropriate action to ensure that pupils and students learn about appropriate relationships, keeping safe, online safety as well as sex and healthy relationships. Relationship, sex education (RSE) and health education lessons will focus on important age-appropriate issues in line with the [RSE and health education](#) statutory guidance. Team members must ensure that pupils and students have the opportunity to learn about safe relationships as well as who they can talk to if they have any concerns. Support and training materials for can be found here: [Teaching about relationships sex and health](#)

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

15.3 Pupils and students will be supported by team members to understand what abuse, neglect and exploitation are. Pupils and students must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse and be able to access relevant websites in private and helplines such as Childline to seek advice and help.

15.4 The school/ college recognises that some pupils/students are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all team members have a responsibility to be the 'eyes and ears' and report all concerns to the DS Lead.

15.5 Please also refer to Part Five of [KCSIE 2026](#): Child-on-Child Sexual Violence and Harassment.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

16.0 Online Safety and Security

Staff must recognise that generative artificial intelligence can create safeguarding risks, including the creation or manipulation of images, impersonation, grooming, misinformation, cyberbullying, sexualised content and the creation or sharing of nude or semi-nude images.

The College will provide age- and developmentally appropriate education and safeguards relating to the safe use of AI, taking account of the particular vulnerabilities and communication needs of pupils and students with SEND.

Please also see the Web Filtering & Monitoring Policy, Staying Safe Online Policy and Mobile and Smart Technology Policy.

- 16.1** There is a whole setting approach to online safety to help equip pupils and students with knowledge and understanding to stay safe online. The school/college helps and supports its pupils/students to recognise and avoid online safety risks and to help build their digital resilience. This is integrated into everyday learning and covered in detail as part of the RSE and health education curriculum.

There are a range of resources to provide support for online safety in schools at: childnet.com

Pupils/ students who are non-verbal or have limited receptive and expressive communication and learning disabilities will need further support. (Please see 15.1).

- 16.2** The school will work with parents and carers to help keep pupils/students safe online. Parents and carers will be informed about what their children and young people are being asked to do online, including the sites they will be asked to access and if their child/young person will be interacting with others online. The Web Filtering & Monitoring Policy includes information about the systems used to filter and monitor online use.

- 16.3** The Group requires safe and secure systems to be put in place within schools that limits the exposure to such risk. The Group operates a highly secure web filtering system on the internet link to the school to safeguard the school's computers and internet use and also offers safeguards on mobile phones and tablets used over the school's Wi-Fi network.

Web filtering and monitoring helps to keep pupils and students safe from illegal and inappropriate content and that they are protected from extremism online when using the school's Wi-Fi. The school works with the Group's IT Section to ensure that the filtering and monitoring systems are appropriate for the school, and are informed in part, by the risk assessment required by the Prevent Duty. The filtering and monitoring systems are reviewed at least annually.

Southwest Grid for Learning <https://swgfl.org.uk/> have created a [testing tool](#) that can be used to check the filtering system is blocking access to illegal child sexual abuse material, unlawful terrorist content and adult content.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the member of the Senior Leadership Team responsible for filtering and monitoring, with support from the DSL and IT/technical support. The review will include checks that filtering and monitoring are operating appropriately across all internet-connected devices and in all relevant locations. A record of the review, findings and any actions required will be retained.

16.4A Mobile phones and smart technology

The College recognises that mobile phones, smart watches, tablets and other connected devices can present safeguarding risks, including access to inappropriate or harmful content, cyberbullying, harassment, exploitation, inappropriate communication, recording or sharing of images or information, and contact with unsafe individuals.

The use of mobile phones and smart technology by pupils/students, staff and visitors must be managed in accordance with the College's Mobile and Smart Technology Policy and other relevant safeguarding procedures.

Staff must remain alert to safeguarding concerns arising from the misuse of mobile phones or smart technology, including the taking or sharing of photographs, videos or recordings of pupils/students, the sharing of nude or semi-nude images, online harassment, bullying, threats, coercion, grooming or contact with unknown or inappropriate individuals.

Any safeguarding concern arising from the use of a mobile phone or smart device must be reported to the DSL in accordance with the College's safeguarding procedures.

For pupils/students with SEND, the College will consider whether mobile phones or smart technology form part of an individual's communication, sensory, accessibility or medical support. Any restrictions on the use of devices should therefore take account of individual needs and reasonable adjustments, while maintaining appropriate safeguarding controls.

The College's filtering and monitoring arrangements will be used alongside clear expectations regarding the use of mobile phones and smart technology. Where concerns arise, these will be considered as part of the College's wider safeguarding and risk assessment processes.

16.4 If a team member has reason to believe that a pupil/student is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 10 must be followed immediately.

16.5 If a team member becomes aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the pupil/student.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the pupil's/student's placing authority and family as appropriate.
- Review the supervision and support arrangements for the pupil/student accessing the internet.
- Check the privacy and security settings on the pupil's/student's devices and account.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the pupil/student.

16.6 Digital technology and its related risks are developing rapidly. An annual review of the school's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks children and young people face. A free online safety self-review tool for schools can be found at <https://360safe.org.uk/> or [LGfL online safety audit](#)

16.7 UKCIS provide a range of resources to support schools and colleges to further develop a whole setting approach towards online safety, including: [Using external expertise to support online safety education](#)

Further helpful resources for online safety:

UK Safer Internet Centre: [Appropriate Filtering and Monitoring](#), [Sextortion](#)

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings](#)

DFE Advice [Harmful Online Challenges and Online Hoaxes](#)

National Crime Agency's CEOP education programme: [ThinkuKnow](#) and [Cyber Choices](#)

LGFL [Undressed](#) provides advice about how to teach children and young people about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

17.0 Children and young people who are absent from education

The DFE's statutory guidance [Working together to improve school attendance](#) sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

17.1 All team members must be aware of the risks associated with children and young people being absent from school or college. Prolonged or frequent absences can be a warning sign for a range of safeguarding issues, including neglect and exploitation - particularly county lines. It is important that the school or college's response to persistently absent pupils/students and children missing education must support the identification of such abuse, and in the case of absent pupils of compulsory school age, helps prevent the risk of them becoming a child missing education in the future.

It is important to be aware that children and young people already known to local authority social care, such as a looked after child, previously looked after child, a child in need or with a child protection plan, may be at increased risk from known safeguarding risks if they are absent from education may increase known safeguarding risks.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

Where there are serious concerns that a missing child or young person may be at risk of serious harm, this must be escalated in line with the Serious Incident Notification Policy within **24 hours**.

- 17.2** Early identification and timely intervention are key to protecting vulnerable children and young people. Schools and colleges must follow the procedures set out in their Attendance Policy to monitor and manage attendance. The attendance of pupils of compulsory school age will be managed in line with legal requirements and statutory guidance as detailed in the School Attendance Policy.
- 17.3** Attendance must be monitored through the setting's Senior Leadership Team meetings and governance.
- 17.4** The DSL must contact the main emergency contact as detailed on the pupil's/student's file should there be concerns regarding the pupil/student absent from education.

Team members must report all unauthorised absences to the DSL, who must make contact with the pupil's parent/carer immediately to establish the pupil's whereabouts. The DSL must inform the placing authority of pupils/students who are frequently absent.

- 17.5** The DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a pupil/student who is absent from education. The DSL **must** refer any safeguarding concerns regarding the absence of the pupil/student to the local authority. Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.
- 17.6** Pupils and students who are repeatedly absent from education are at increased risk of harm. Attempts must be made to talk to them about why they are absent from education. Records must be kept of those discussions.

Any safeguarding information which the pupil/student discloses must be shared **immediately** with the local authority. If the pupil/student discloses immediate safeguarding concerns, the DSL must share this information with the police.

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

- 18.1** Exploitation is a form of child abuse and can include sexual and/ or criminal exploitation. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.
- 18.2** CSE and CCE can affect boys and girls and can include children and young people who have been moved (referred to as trafficking) for the purpose of exploitation. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that both boys and girls can be at risk of criminal

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

exploitation. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Criminal Exploitation and Child Sexual Exploitation may be committed or facilitated by an individual, an organised network or gang. Children may be exploited through coercion, manipulation, deception, violence or threats of violence and may identify themselves as being part of the group or network exploiting them.

Exploitation may involve criminal offences being committed by the child or young person under coercion or manipulation. Staff must recognise that a child may be both a victim of exploitation and involved in offending behaviour.

CCE may constitute modern slavery or trafficking where the legal criteria are met. Staff should remain alert to indicators of modern slavery, trafficking and exploitation and refer concerns promptly through local safeguarding procedures.

The College recognises that children with SEND, communication difficulties, social vulnerabilities or limited understanding of risk may be particularly vulnerable to grooming, coercion and exploitation.

- 18.3** Schools must write and implement a local exploitation procedure which team members must be familiar with. All team members **must** read the Group's Exploitation policy as well as refer to [KCSIE 2026](#)
- 18.4** All team members **must** know the definitions, signs and indicators of CSE, CCE and County Lines. DSL must provide ongoing training and learning to team members around exploitation. All team members **must** have training in exploitation.
- 18.5** Team members **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to a child's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director.
- 18.6** It is the responsibility of all team members to help children and young people know about grooming and exploitation. Schools and colleges must ensure that pupils/students know who to talk to if they have any concerns for themselves or others.

Please also see [multi-agency principles - child exploitation and extra-familial harm](#)

[The Children's Society - Preventing Child Sexual Exploitation](#)

The [NWG Network](#) provides Information to help educate and prevent child exploitation and abuse across the UK. The Group has membership of the network for all team members which can be accessed through the chat/help facility on the [Welcome to the NFG Network](#) page, or by emailing network@nwgnetwork.org

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

19.0 Serious violence

The College recognises that children and young people may be at risk of serious violence both within and outside the College environment. Staff must remain alert to indicators that a child may be at risk of becoming involved in serious violence or may already be experiencing harm.

Indicators may include unexplained injuries, possession of weapons or items that could be used as weapons, changes in behaviour or relationships, association with older individuals or criminal groups, unexplained gifts or possessions, increased absence, deterioration in attendance or engagement, self-harm, changes in emotional wellbeing, intimidation, threats, bullying, involvement in criminal exploitation or significant changes in peer relationships.

Staff should also consider the impact of SEND, trauma, communication difficulties, social vulnerability, exploitation and other individual circumstances when assessing risk.

Where there is a concern that a child or young person is at risk of serious violence, the concern must be reported to the DSL immediately. The DSL will consider whether a referral to children's social care, the police or other relevant agencies is required.

Further guidance for professionals can be found here:

[Advice to schools and colleges on gangs and youth violence](#)

[Criminal exploitation of children and vulnerable adults: county lines](#)

[County Lines Toolkit for Professionals](#) includes information on the signs of a child's involvement in county lines, published by the Home Office and The Children's Society.

20.0 'Honour'-based abuse including FGM and Forced Marriage

20.1 Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

20.2 HBA can affect people of all ages but often begins early in the family home. Girls and women are particularly at risk; however, boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.

20.3 HBA can take many forms, it can include: forced marriage; female genital mutilation; Breast ironing; virginity testing and/or physical, sexual and economic abuse and coercive control. Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

20.4 If team members have a concern regarding a child or young person who might be at risk of HBA or who has suffered from HBA, they must speak to the DSL (or deputy). As appropriate, the DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

20.5 Teachers and support staff, along with regulated health and social care professionals in England and Wales, have a specific legal duty to report concerns regarding Female Genital Mutilation (FGM), ([under Section 5B of the Female Genital Mutilation Act 2003, section 74 of the Serious Crime Act 2015](#)) If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. In suspected cases of FGM, team members must refer to the local authority as well as the police. The DSL will assist and support team members with this.

20.6 Team members must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': [Female Genital Mutilation: the facts](#)

20.7 Since February 2023, the legal minimum age to enter into a marriage in England and Wales is 18. In these nations, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email fmufcdo.gov.uk. A [Forced marriage resource pack](#) has been designed to highlight examples of best practice and to help ensure that effective support is available to victims of forced marriage.

Multi-agency statutory guidance for dealing with **forced marriage**, can found at: [The right to choose government guidance on forced marriage](#)

20.8 The DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse, CSE and Trafficking or Radicalisation are shared **immediately** with the Regional Director and Chair of Governors, and that team members have documented them appropriately.

21.0 Preventing Radicalisation and the Prevent Duty

Team members must be familiar with the Protecting Children & and Young People from Radicalisation Policy

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- 21.1** We fully recognise our responsibility to have arrangements in place to safeguard and protect children and young people from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools and colleges to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the [Prevent Duty](#)
- 21.2** All team members must be aware of the signs and indicators of radicalisation. Team members must be proactive in reporting any concerns, regardless of how small they may be, to the DSL who must assist team members to report all concerns regarding radicalisation to the Police as well as the Regional Director. Team members must document their concerns appropriately.
- 21.3** To safeguard children and young people who are vulnerable to radicalisation, DSLs will need to take a risk-based approach and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. Further information can be found at: [Understanding and identifying radicalisation risk in your education setting](#)
- 21.4** DFE has produced a Self-assessment tool to help schools and colleges in England review their responsibilities under the Prevent duty, which can be found here: [Prevent duty self-assessment tool for schools and further education providers](#) The tool helps schools to understand how well embedded their existing policies and practices are, and to encourage a cycle of continuous review and improvement. It contains requirements and recommends good practice activities to meet those requirements.
- 21.5** All team members must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Pupils and students requiring support with their Mental Health

Syon Manor College recognises that mental health and safeguarding are closely connected. Mental health difficulties may be a consequence of abuse, neglect, exploitation, trauma or other adverse experiences, and may also increase a child's vulnerability to harm.

The College will maintain systems for identifying children and young people who may require mental health support and will ensure that safeguarding concerns are considered alongside mental health needs.

Staff must remain alert to significant changes in behaviour, emotional presentation, attendance, engagement, communication, relationships, self-care, sleep, eating, mood or functioning. Staff must not assume that changes are solely attributable to a child's SEND, diagnosis, medication or existing mental health needs.

Where a child presents with mental health difficulties, staff should consider whether there may also be an underlying safeguarding concern, including abuse, neglect, exploitation, bullying, harmful sexual behaviour, domestic abuse, online harm, criminal exploitation or other extra-familial harm.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

The College will provide appropriate internal support and, where required, seek advice or make referrals to external services. The child's wishes and feelings will be considered, while recognising that safeguarding duties may require information to be shared without consent where necessary to protect the child or others.

Where there is an immediate risk to life or serious harm, emergency services must be contacted. All concerns, decisions, referrals and support arrangements must be appropriately recorded, including the rationale for decisions made.

Where mental health concerns are linked to safeguarding, the DSL will work closely with the relevant clinical, pastoral, educational and external professionals to ensure that the child's needs are considered holistically.

- 22.1** The [Mental Health and Behaviour in Schools guidance \(2018\)](#) provides guidance advice on how to create a whole school culture in promoting positive mental health outcomes for children and young people. This guidance is written for schools, but the interventions and support included may be helpful for colleges and other post 16 provision.

Public Health England provide [Every Mind Matters](#) to help teach RSE and health education, providing simple, practical advice for a health mind.

22.2 Safeguarding children and young people with medical conditions

Syon Manor College recognises that children and young people with medical conditions may have additional safeguarding vulnerabilities. This may include increased reliance on adults for personal care, medication or physical support, difficulties communicating symptoms or concerns, periods of absence from education, hospital admissions, changes in behaviour or presentation, and increased dependence on particular adults or services.

Staff must understand that a medical condition, disability or associated behaviour must not be assumed to explain away a safeguarding concern.

The College will ensure that relevant medical information, healthcare plans and safeguarding information are appropriately shared with staff who need the information to keep the child safe. Where a child has a medical condition that affects their communication, cognition, emotional regulation or ability to report concerns, the College will ensure that reasonable adjustments are made to enable the child to communicate and participate in safeguarding processes.

Any significant change in a child's medical presentation, care needs, personal care, medication, attendance or behaviour should be considered within the wider safeguarding context.

The College will work with parents/carers, health professionals, social care, placing authorities and other relevant agencies to ensure that medical and safeguarding needs are considered together.

23.0 Physical Interventions

All team members must read and know the setting's Physical Intervention Policy and the Use of Restrictive Practices and Restraint Terms of Reference Policy.

- 23.1** While every school/college creates an atmosphere of nurturing, unconditional positive regard and warmth, the Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child/young person is safe and calm, it is essential that there is a debrief with them. It should be an open discussion with the team member encouraging the pupil/student to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the school's/college's electronic recording system.

- 23.2** If a pupil/student makes an allegation after a physical intervention, it is important that the team member writes down as much information as possible. Team members must complete body maps immediately after the event and make an appropriate electronic record. Team members must also verbally inform the DSL (or deputy) and record it onto the school's/college's electronic recording system. **Medical attention must always be sought for the young person.** Team members must inform their parents or carers/ those with parental responsibility.

Allegations of harm relating to physical interventions must be reported to the Regional Director, the Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk) and the Local Authority Designated Officer or local equivalent.

24.0 Allegations against team members

Please also see the Managing Allegations Against an Employee Policy

- 24.1** An allegation is any concern, complaint or disclosure that indicates a team member has:

For the purposes of this section, "staff" includes employees, agency and supply staff, contractors, volunteers, trainee teachers, students on placement and other adults working in or on behalf of the College.

- Behaved in a way that has harmed a child or young person or may have harmed a child or young person
- Possibly committed a criminal offence against or in relation to a child or young person
- Behaved towards a child/young person or children/young people in a way that indicates he or she may pose a risk of harm to children/young people; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

24.2 All allegations must be treated seriously. Team members must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that team members maintain a level of professional curiosity. Team members have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Team members must report any concerns to the Regional Director and the DSL.

24.3 When a pupil/student makes an allegation about a member of team member, the team member receiving the complaint must:

- write everything down and document it on the school's/college's electronic recording system.
- immediately report the allegation to the DSL (or deputy).

The DSL must:

- take all allegations seriously regardless of whether a pupil/student has made previous allegations;
- report allegations to the Local Authority Designated Officer or local equivalent within one working day;
- ensure that they follow the Group's Managing Allegations Against an Employee Policy.

24.4 Part four of [KCSIE 2026](#) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff or any team member employed by a third party working in the school or college setting. Whilst the individual may not be employed by the Group, **schools and colleges must ensure** that allegations are managed properly.

[KCSIE 2026](#) states: 'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'

The College retains safeguarding oversight of concerns and allegations involving staff supplied or placed by third-party organisations, including agency workers, contractors, trainee teachers and other placement students. The College will liaise with the relevant organisation and the LADO as appropriate and will not simply cease using an individual without appropriate consideration of the facts and relevant safeguarding procedures.

24.5 If the allegation is regarding the Headteacher, Principal or equivalent then the Regional Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer local equivalent.

24.6 All allegations made against team members must be reported to:

- the Regional Director

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

- Human Resources (peopleadvice@ofgl.co.uk)
- Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk)

The Group recognises that managing allegations can be challenging and will support with the process. Please refer to the Managing Allegations Procedure for further details.

24.7 It is the responsibility of the DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

25.0 Low-level concerns

Team members must read and follow the Low-Level Concerns Policy

25.1 Team members must understand what low-level concerns are and be aware of the process for addressing low-level concerns.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that **an adult working in or on behalf of the school or college** may have acted in a way that is inconsistent with the Group's code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or local equivalent. ([KCSIE 2026](#))

Examples may include but are not limited to:

- being over friendly with children/young people; erosion of boundaries
- taking photographs of children/young people on their mobile phone;
- having favourites; engaging with a child or young person on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

25.2 The Headteacher, Principal or equivalent is the ultimate **decision maker in respect of low-level concerns**

All low-level concerns must be shared with the Headteacher, Principal or equivalent, or the DSL. The **DSL must inform the Headteacher**, Principal or equivalent of all the low-level concerns, in a timely fashion according to the nature of each particular low-level concern.

If there are concerns about the headteacher, Principal or equivalent these concerns should be referred to a senior member of the Group (such as the Regional Director, Operations Director, Managing Director, Chief Operating Officer or Chief Executive Officer). If there is a conflict of

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or local equivalent.

25.3 Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

25.4 Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any child or young person may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher, Principal or equivalent should decide on an appropriate course of action.

25.5 Where there are three or more recorded low-level concerns in relation to the same team member, the Headteacher, Principal or equivalent must notify HR peopleadvice@ofgl.co.uk so the collective concerns can be reviewed and further action taken as required. Advice and support can also be sought from safeguarding@ofgl.co.uk. All reviews must be clearly recorded on HR file and on the low-level concern log.

26.0 Working with the Local Authority Designated Officer or local equivalent

In all referrals, the DSL is the lead professional within the school/ college for ensuring that a timely response is received from the local authority. If a response is received which the DSL believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Headteacher, Principal or equivalent or Governors of the school/ college to agree further action.

27.0 Whistleblowing

27.1 We recognise that on occasion team members may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. We also recognise that pupils and students will be unable to voice their concerns if they are in an environment where team members do not feel able to voice their concerns.

27.2 Team members have a duty first and foremost to the pupils/students in their school/college. Any concerns, regardless of how small they may seem, must be reported. DSLs and Headteachers, Principal or equivalent have a responsibility to ensure that they create an environment where team members feel safe to openly voice any concerns and feel listened to. It is also important that team members feel supported if concerns are raised about them. If team members see or hear about other colleagues' practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil/student, or if the standard of care being provided falls short of expectations, they must report this.

27.3 The Group has an anonymous telephone support system (Safecall) where team members are able to share any concerns that they may have, safely and without fear of reprisal. All

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

whistleblowing concerns will be taken seriously and treated as such. Team members can call Safecall on **08009151571**, report online [Safecall](#) or email outcomesfirstgroup@safecall.co.uk

28.0 **Alternative provision and work experience placements**

Where a child or young person attends alternative provision e.g. college, horse-riding centre etc or a work experience placement, the school/college continues to be responsible for the safeguarding of that child/young person. The school/college must ensure that the provision has sufficient safeguarding arrangements in place and is able to meet the individual pupil's/student's needs.

Schools and colleges should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school/college would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school/college of any arrangements that may put the child/ young person at risk (i.e. staff changes), so that the commissioning school/college can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Please also see the Alternative Provision Policy and the Work Experience Policy, and the DFE's statutory guidance to which schools and colleges must have regard to:

- [Alternative Provision](#) and
- [Education for children with health needs who cannot attend school](#)

29.0 **Digital and Remote Learning**

Where digital learning and remote learning options are provided for pupils and students, all team members should be mindful that the group's and school's/college's **safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply at all times when working online or offline at any location.**

29.1 Acorn Digital Learning provides online teaching for those who currently find themselves without access to a school setting, or are unable to attend school for medical, mental health, anxiety or behavioural reasons. Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template can be utilised as required. Please email acorndigitalllearning@ofgl.uk for information.

29.2 Data protection and GDPR considerations must be taken into account. This includes rules on signing pupils and students up to online services, and team members accessing personal data when working at home. It is recommended that team members are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from the school/college or remotely.

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

29.3 The guidelines for digital learning below must be followed:

- Ensure parents and carers are aware of online safety advice and resources such as [Thinkuknow](#) and [Safer Internet Centre](#), [Net-aware](#), [Digital Parenting Pro](#)
- If team members are concerned about a comment made online by a pupil/student or the work they share, the team member should report it to the DSL.
- Team members, pupils and students should be fully dressed and take into account the background/ surroundings. Team members should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet used.
- The teacher may need to give guidance to pupils to remove items from view. If a pupil/student is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.
- Team members must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement. If there is a need for single pupil/student interaction, please ensure that a colleague is added to the call, or that a parent is present with the pupil/student.
- If a team member urgently needs to call a parent or pupil/student from their personal phone, the number must be withheld by dialling 141 first and a record of the call must be made e.g. an email to the Headteacher, Principal or DSL to explain the purpose of the call and any actions taken as a result of it.
- Home filters may block different content at a different level to the school's/college's filtering software; if this appears to be the case for one pupil/student in the group the teacher should revert to or suggest an alternative resource.
- Take care that any material provided to pupils/students to watch is age and developmentally appropriate. For instance, do not ask Year 9 pupils to watch a film with a 15 rating.
- Team members should model good online behaviour in all ways, including the language used to interact with pupils/students and colleagues, which should be respectful at all times. School and college leaders should make clear to team members the operating times for online learning (for example, only during the normal school day); no team member should engage with or respond to a pupil/student outside these times.
- Clear guidelines for connecting to a virtual classroom session will be given by the school/college, and the teacher will check their understanding.
- The same principles apply to virtual meetings between team members and parents as face-to-face meetings.

Further helpful resources for digital learning:

- DfE advice: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#) • UKCIS [External visitors guidance](#)

30.0 Home visits

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

Where team members need to make home visits, they must follow the College's Lone Working Policy and any relevant local procedures and guidance.

Before undertaking a home visit, appropriate consideration must be given to the safety and wellbeing of the staff member, the pupil/student and any other individuals who may be present. Where there are known risks associated with the household or circumstances, these must be considered as part of an appropriate risk assessment and discussed with the DSL or relevant senior leader before the visit takes place.

Team members must inform an appropriate colleague of their whereabouts, the address being visited and the expected time of return. Wherever possible, home visits should be undertaken by two members of staff where there are identified safeguarding, behavioural or personal safety concerns.

Staff must remain professionally curious during home visits and should report any safeguarding concerns identified or disclosed during the visit to the DSL without delay. This includes concerns relating to neglect, domestic abuse, exploitation, unsafe living conditions, parental/carers capacity, changes in presentation or behaviour, or any other circumstances that may indicate that a pupil/student is at risk of harm.

Staff must not attempt to investigate safeguarding concerns themselves. Any concern must be recorded promptly and accurately on the College's safeguarding recording system and managed in accordance with the College's safeguarding procedures.

Where a home visit identifies an immediate risk of serious harm, the College's emergency safeguarding procedures must be followed and appropriate emergency services or statutory agencies contacted where necessary.

For pupils/students with SEND, staff should consider whether communication, sensory, cognitive or other support needs may affect the pupil/student's ability to communicate their wishes, feelings or concerns during or following a home visit. Appropriate reasonable adjustments should be made where required.

31.0 Policy Review

This policy will be reviewed annually, as a minimum to ensure it is kept up to date with safeguarding issues as they emerge and evolve. Where necessary, updates will be made during the year.



Outcomes
First Group