Safeguarding and Child Protection Policy

WARREN FARM
PRIMARY SCHOOL

Approved by: **Judith Dovey** **Chair of Trustees**
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Safeguarding Policy Approach

A whole-school, child-centred approach is fundamental to all aspects of everyday life at our school. At Warren Farm Primary School, we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is important to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.

In line with our duties set out in the Children Act 1989 and 2004, Working Together to Safeguard Children and Keeping Children Safe in Education 2026, we are committed to providing help and support as soon as problems emerge, protecting children from maltreatment whether within or outside the home including online, preventing impairment of children's mental and physical health or development, ensuring children grow up in circumstances consistent with safe and effective care, and taking action to enable all children to have the best outcomes.

We recognise that support may be provided through universal services, community-based Early Help, targeted early help delivered through Family Help and, where thresholds are met, statutory services under sections 17, 20, 31 and 47 of the Children Act 1989.

This policy outlines our legal duties to safeguard children, the responsibilities for all staff, and the specific roles and responsibilities for our Designated Safeguarding Leads and Governance.

1. Important Safeguarding Contacts

School's In-House Contacts

Organisation / Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Mandip Nandhra	Mandip.nandhra@warrenfarmgo.co.uk Full Time
Deputy Designated Safeguarding Lead (DDSL)	Samantha Garey	Samantha.garey@warrenfarmgo.co.uk Full Time
Deputy Designated Safeguarding Lead (DDSL)	Simon Taylor	simontaylor@warrenfarmgo.co.uk Full Time
Deputy Designated Safeguarding Lead (DDSL)	Andrew Davis	Andrew.davis@warrenfarmgo.co.uk Full Time
Deputy Designated Safeguarding Lead (DDSL)	Nicola Gosling	Nicola.gosling@warrenfarmgo.co.uk Tuesday to Friday
Designated Teacher for Children in Care (DT for Children in Care)	Mandip Nandhra	mandip.nandhra@warrenfarmgo.co.uk

Special Educational Needs Coordinator (SENCO)	Nicola Gosling	Nicola.gosling@warrenfarmgo.co.uk Tuesday to Friday
Mental Health Lead	Mandip Nandhra	mandip.nandhra@warrenfarmgo.co.uk
DSL Prevent Lead	Mandip Nandhra	mandip.nandhra@warrenfarmgo.co.uk
Chair of Governors	Judith Dovey	judith.dovey@warrenfarmgo.co.uk
Vice Chair of Governors	Amanda Lees	amanda.lees@warrenfarmgo.co.uk

Link Safeguarding Governor	Judith Dovey	judith.dovey@warrenfarmgo.co.uk

Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	Tel: 0121 675 1669 Email:ladoteam@birminghamchildrenstrust.co.uk
Birmingham Children's Trust	Children's Advice and Support Service (CASS)	**Monday to Thursday: 8:45am to 5:15pm:** • Friday: 8:45am to 4:15pm • Telephone: 0121 303 1888 **CASS emergency out-of-hours:** • Telephone: 0121 675 4806
Early Help		Early Help Support Team: Telephone: 0121 303 8117 or contact your Early Help District teams
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
Police	N/A	Emergency 999. Non-emergency 101

2. Legislation and Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2026, which replaces the September 2025 version and comes into force on 1 September 2026.

- Keeping Children Safe in Education 2026, including Part One, which all school and college staff should now read in full. References to the previous condensed Annex A have been removed because KCSIE 2026 expects staff who do not work directly with children to read Part One.
- Working Together to Safeguard Children statutory guidance, which should be read alongside KCSIE.
- Information Sharing: Advice for Practitioners, including the seven golden rules for sharing information.
- Data protection laws, meaning the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
- Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009.
- The Equality Act 2010, the Public Sector Equality Duty and the Human Rights Act 1998.
- The Counter-Terrorism and Security Act 2015 and revised Prevent duty guidance.
- The Crime and Policing Act 2026 changes to regulated activity, including the removal of the supervision exemption for certain volunteers.
- The Children's Wellbeing and Schools Act duties referenced in KCSIE 2026, including temporary accommodation notification duties.

All settings should add or retain setting-specific statutory references, for example early years, academy, independent, non-maintained special school or residential provision requirements, as applicable.

3. Definitions: Safeguarding and Child Protection

All staff at Warren Farm Primary School are expected to be familiar with the wide range of policies and procedures we have to keep children safe and promote their wellbeing at all times.

Safeguarding and promoting the welfare of children, as defined in Keeping Children Safe in Education 2026, means: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring children grow up in circumstances consistent with safe and effective care; and taking action to enable all children to have the best outcomes.

Family Help means providing support as soon as a problem emerges at any point in a child's life. KCSIE 2026 distinguishes between universal services and community-based Early Help, and the targeted early help level of Family Help. (Early Help Assessment and Our Family Plan - Birmingham Safeguarding Children Partnership).

The Right Help, Right Time guidance document advises what support is available whatever the needs are of children young people and their families. It is the framework and practice guide on how all individuals, agencies, partners and practitioners work together in Birmingham.

Child Protection: under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, it must make enquiries. Such enquiries should be initiated where there are concerns about all forms of abuse, neglect and exploitation, whether taking place in person or online, inside or outside the child's home.

Nudes and semi-nudes: KCSIE 2026 uses this term to refer to the creation, sending or posting of nude or semi-nude images by young people under 18. Images include photographs, videos and livestreams, and may be taken by the child, taken or created by another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or deep nudes.

Victim, alleged perpetrator and perpetrator are recognised terms in KCSIE; however, the school will be conscious that children may prefer different language and will use appropriate terminology on a case-by-case basis.

4. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and to ensuring that all children are provided with appropriate protection regardless of additional needs, barriers or protected characteristics.

KCSIE 2026 strengthens the expectation that schools consider disproportionate vulnerabilities linked to protected characteristics and ensure safeguarding policies, procedures, record keeping and monitoring help identify and respond to sexual violence, sexual harassment, misogyny/misandry, racism, faith-based prejudice, homophobic, biphobic or transphobic bullying and other forms of harm.

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Children who may benefit from additional support before statutory intervention:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs, whether or not they have an Education, Health and Care Plan
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves

- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn into anti-social or criminal behaviour, including county lines
- is frequently missing or goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, is in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of radicalisation into terrorism
- has a parent or carer in custody or is affected by parental offending
- is in family circumstances presenting challenges such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing alcohol or other drugs
- is at risk of honour or faith-based abuse such as FGM or forced marriage
- is privately fostered

Children with Special Educational Needs and Disabilities (SEND), health conditions and medical needs

Children with SEND, certain medical conditions or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers may include assumptions that indicators of possible abuse relate to the child's condition, peer isolation or prejudice-based bullying, communication barriers, difficulties understanding or reporting abuse, greater dependence on adults for care, intimate care needs and cognitive understanding of online content.

Any reports of abuse involving children with SEND will require close liaison between the DSL or deputy and the SENCO or named person with oversight for SEND. The school will consider extra pastoral support, attention and communication support for these children.

Children who are lesbian, gay, bisexual or questioning their gender

A child being lesbian, gay or bisexual is not in itself a risk factor for harm, but children can be vulnerable to discriminatory bullying. Children perceived by others to be lesbian, gay or bisexual can be just as vulnerable. The school will address these vulnerabilities through its anti-bullying, behaviour and safeguarding arrangements.

Where a child or parent/carer requests support relating to social transition, the school will not initiate action itself. Any request will be considered taking account of safeguarding duties, the welfare and best interests of the child and other children, parental involvement unless this would create greater risk, equality and human rights obligations, educational context, and the need to document decisions and keep them under review. Staff should not adopt any changes relating to social transition unless a school decision has been made and parents or carers have been involved as set out in KCSIE 2026.

Schools must not allow pupils into toilets, changing rooms, showers, boarding or residential accommodation designated for the opposite biological sex. Alternative arrangements may be considered where appropriate, provided they do not compromise the safety, comfort, privacy or dignity of the child or other children. Schools must record and review such arrangements.

5. Roles and Responsibilities of Staff including Leadership and Management

Specific updates to definitions and indicators:

- Abuse may include harm caused by a child to other family members, often referred to as child to parent or caregiver abuse.
- Emotional abuse can include verbal abuse such as persistent criticism, belittling or name-calling.
- Sexual abuse includes assault by penetration, penetration with an object, and non-contact abuse such as involving children in production of sexual images, forcing children to look at sexual images or watch sexual activities, or grooming including online.
- Exploitation and modern slavery are forms of abuse. Children who are criminally exploited must have their vulnerabilities recognised and should be treated as victims; it is not possible for a child to consent to being exploited, abused or trafficked.
- CSE and CCE may be committed or facilitated by an organised network or gang, and a victim may identify as being part of this group; this may constitute modern slavery and require relevant child protection and modern slavery referrals.

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

At <Insert name of school>, we know that children can abuse other children, including online. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is preventable and timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

- serious physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment, which may include misogyny/misandry
- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI online abuse through abusive, harassing and misogynistic/misandrist messages, non-consensual making or sharing of nudes or semi-nudes, and sharing abusive images or pornography with those who do not want to receive such content

Domestic abuse and Operation Encompass

Domestic abuse can include psychological, physical, sexual, financial or emotional abuse. Children can be victims of domestic abuse where they see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships, including teenage relationship abuse.

Operation Encompass is an information-sharing scheme between the police and education settings. KCSIE 2026 notes a statutory duty on police to notify a child's education setting, and where relevant local authorities, where they have reasonable grounds to believe a child may be a victim of domestic abuse. The DSL is likely to be the Key Adult and may use a central safeguarding inbox to oversee notifications. Notifications do not replace statutory safeguarding procedures or referrals.

Mental health

Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, eating disorder signs, suicidal ideation or risk of suicide, and may also be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation.

Education staff are not expected to diagnose mental health problems but are well placed to observe behaviour and identify children who may be struggling. If a child is in danger, staff should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If urgent mental health help is needed but it is not an emergency, staff can use NHS 111 online or call 111 and select the mental health option.

Serious violence

Serious violence may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict or bullying, and can be associated with criminal exploitation. Staff should report concerns about a child carrying or using a weapon, or expressing intent to do so, to the DSL or deputy.

The DSL should assess risk to the individual pupil and others, consider wider information, and take appropriate action. Depending on the risk, this may include a safety and support plan and consideration of action to de-escalate peer conflict. Schools should be alert to higher risks for children with disrupted education, including suspensions, permanent exclusions, time in alternative provision or a history of offending.

Responding when children disclose or staff have concerns

Staff should act immediately, follow the child protection policy and speak to the DSL or deputy. If the DSL or deputy is unavailable in exceptional circumstances, this must not delay action; staff should speak to a senior member of staff and/or take advice from local authority children's social care. Any action taken should be shared with the DSL or deputy as soon as practically possible.

When responding to reports of HSB, sexual harassment or sexual violence, staff should listen carefully, avoid judgement, use the child's language, ask open questions, not promise confidentiality, record only what the child says without interpretation or personal opinion, and inform the DSL as soon as practically possible.

Harmful sexual behaviour, sexual harassment and sexual violence

KCSIE 2026 substantially strengthens this area. Harmful sexual behaviour can occur between children of any age and sex, online or face-to-face, and may escalate into sexual harassment or sexual violence. HSB should always be considered within a child protection context.

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, regardless of whether they are consensual or non-consensual. The response should be proportionate and consider age, development, circumstances, coercion, exploitation and vulnerability.

Following a report of sexual violence, the DSL or deputy should carry out an immediate risk and needs assessment. For sexual harassment, the need for a risk

assessment should be considered case-by-case. Assessments should be recorded, regularly reviewed and used to inform safeguarding decisions.

For reports of rape or assault by penetration, while facts are established and agencies are consulted, the alleged perpetrator should be removed from any shared classes with the victim and the school should consider reasonable separation across premises and transport. These actions are in the best interests of all children and should not be treated as a judgement on guilt.

Prevent and concerns about extremism

Warren Farm Primary School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2)

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

6. Online Safety and Filtering

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

The breadth of online safety issues is considerable and ever evolving. KCSIE 2026 continues to use the 4Cs but updates them as follows:

- Content: exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation and conspiracy theories.
- Contact: harmful online interaction with other users or generative AI applications that simulate this, including peer pressure, commercial advertising and adults posing as children or young adults to groom or exploit them sexually, criminally, financially or otherwise.
- Conduct: online behaviour that increases the likelihood of, or causes, harm, including making, sending and receiving explicit images, including those generated using AI, and online bullying.
- Commerce: online gambling, inappropriate advertising, phishing and financial scams.

Online safety must be a running and interrelated theme across safeguarding, related policies, curriculum planning, staff training, DSL responsibilities and parental engagement.

Guidance to support schools to understand safety considerations and legal responsibilities when using generative AI, whether teacher-facing or pupil-facing, should be considered. Schools should also consider the DfE resources to help staff use AI safely and effectively, including safeguarding, ethics, data protection and intellectual property risks.

The DfE expects schools to operate as mobile phone-free environments by default. The school will implement a policy whereby pupils do not have access to mobile phones throughout the school day, including lessons, movement between lessons, breaktimes and lunchtimes, unless an exception has been agreed by the Headteacher/Principal.

Filtering and monitoring systems will be reviewed at least once every academic year. Reviews should be carried out by the SLT member responsible for filtering and monitoring, with support from the DSL and IT support, and should include checks that filtering works appropriately on all internet-connected devices in all relevant locations. A record of these checks should be kept.

The school will have measures to protect personal information and appropriate cyber security systems, approached as part of wider safeguarding responsibilities. The school will consider the Cyber Security Standards for Schools and Colleges.

7. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors

All staff based within our school will be considered to be in either a position of trust or working with children. Staff must immediately report any level of concern about

the behaviour or conduct of an adult working or volunteering with children, including supply teachers, trainee teachers, volunteers, contractors and adults using or hiring the school premises.

KCSIE 2026 adds explicit reference to trainee teachers throughout the allegations framework. Where concerns or allegations relate to a trainee teacher placed within the school, the expectations set out for schools and colleges apply and teacher training providers are expected to follow the same procedures as supply agencies.

If staff have a safeguarding concern or an allegation that another member of staff, including supply staff, trainee teachers, volunteers or contractors, has harmed or poses a risk of harm to children, this should be referred to the Headteacher or Principal, who will consider whether onward referral to the LADO is required. If the concern/allegation is about the Headteacher or Principal, it should be referred to the Chair of Governors or equivalent. Where there is a conflict of interest, it should be reported directly to the LADO.

Before contacting the LADO, the school may conduct basic enquiries in line with local procedures to establish facts without jeopardising any future police investigation. This may include whether the individual was in school, whether contact with the child could have occurred, whether there were witnesses and whether there is CCTV footage.

Suspension should not be automatic. Alternatives should be considered, including redeployment, supervision, alternative duties, or moving the child to a different class only where this is in the child's best interests, is not a punishment and parents have been consulted. Immediate suspension must be justified and recorded, including alternatives considered and why they were rejected.

Where an allegation is substantiated and a person is dismissed, resigns or ceases to provide services, the school must consider statutory duties to refer to the DBS where criteria are met, and for teaching staff consider referral to the Teaching Regulation Agency. These duties also apply to volunteers where they were engaged in regulated activity.

Low-level concerns - See Appendix 1 for the policy

A low-level concern does not mean the concern is insignificant. It is any concern, however small, including a sense of unease or nagging doubt, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside work, and does not meet the harm threshold or is not serious enough to consider referral to the LADO.

Low-level concerns must be shared responsibly, recorded in writing, kept confidential and reviewed so that patterns of concerning, problematic or inappropriate behaviour can be identified. Concerns about supply staff and contractors should be notified to their employers so potential patterns can be identified.

Use of school premises for non-school activities

Where the school hires or rents out facilities to organisations or individuals, safeguarding requirements will be included in lease or hire agreements as a condition of use. Failure to comply will lead to termination of the agreement. Where an allegation arises from an activity on school premises, the school will follow its safeguarding policies and procedures, including informing the LADO where appropriate.

8. Record Keeping

Warren Farm primary School will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. Records should be clear, factual and distinguish between observed concerns, professional opinion and historic information.

- 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
- the rationale for decisions, including where referrals were or were not made to local authority children's social care, Prevent or other agencies

The child protection file should be transferred securely and separately from the main pupil file. Where files are transferred, the exporting school should include a clear, structured summary identifying current safeguarding concerns, relevant context and ongoing support needs. Historic information should be appropriately contextualised so safeguarding information supports rather than disadvantages the child.

Where information indicates a risk to others and/or the individual child, for example previous carrying, threatening with or using a knife or weapon, the receiving school should assess risk and, accordingly, put in place a safety and support plan when the child arrives.

Receiving in and transferring pupil records to other education provision

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

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

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

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

Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- a clear retention policy
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

Appendix: Links to useful information

Local

- Birmingham Safeguarding Children Partnership
- Right Help, Right Time - Birmingham Safeguarding Children Partnership
- Early Help Assessment and Our Family Plan - Birmingham Safeguarding Children Partnership
- Having those difficult conversations: The Importance of the Resolution and Escalation Protocol - Birmingham Safeguarding Children Partnership
- Birmingham Children's Trust
- Birmingham City Council - Children, Young People & Families
- BCC School Safety Plan re children who pose a risk to others
- BCC Corporate Safeguarding Policy
- No platform policy | Birmingham City Council
- Suicide postvention support package for education establishments | Birmingham City Council

National and statutory guidance

- Keeping Children Safe in Education 2026
- Keeping Children Safe in Education 2026: Part One
- Working Together to Safeguard Children
- Information Sharing Advice for Safeguarding Practitioners
- Data Protection Toolkit for Schools
- Prevent Duty Guidance
- Channel Guidance
- DfE Filtering and Monitoring Standards

- Cyber Security Standards for Schools and Colleges
- Mobile Phones in Schools
- Use of Reasonable Force in Schools
- Alternative Provision Guidance
- Supporting Pupils at School with Medical Conditions
- Allergy Safety in Schools
- Operation Encompass
- UKCIS Sharing Nudes and Semi-Nudes Guidance
- Generative AI in Education
- Generative AI Product Safety Expectations
- Youth Endowment Fund Toolkit
- Children Missing Education
- Working Together to Improve School Attendance
- Staffing and employment: advice for schools (DfE)

Appendix 1

Low Level Concerns about staff

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

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

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