



ODYSSEY HOUSE SCHOOL

Child Protection and Safeguarding Policy

Odyssey House School is part of Odyssey Education Services.

Odyssey Education Services is Registered in England and Wales, company number 1162321,
registered at 329 Doncastle Road, Bracknell, RG12 8PE

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Designation: CEO

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This policy applies to –

All staff, leaders, proprietors, volunteers, contractors, supply staff, visitors and all pupils at Odyssey House School Wokingham

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1. Contacts and Urgent Safeguarding Action

Immediate action

If a child is at immediate risk of significant harm, staff must call 999 and then inform the DSL or a deputy DSL as soon as it is safe to do so. A concern must be recorded on CPOMS as soon as possible and on the same working day.

Role / organisation	Name	Contact details
School safeguarding email	Monitored by relevant safeguarding staff	ohswoksafeguarding@odysseyeducation.org.uk
Designated Safeguarding Lead, Wokingham	Tristan Powell	Tristan.powell@odysseyeducation.org.uk
Deputy DSL / SENCO	Tamsin Butcher	Tamsin.butcher@odysseyeducation.org.uk
Deputy DSL, Primary section	Emily Kirkham	emily.kirkham@odysseyeducation.org.uk
Prevent single point of contact	Tristan Powell	Tristan.powell@odysseyeducation.org.uk
Prevent SPOC in absence	Tamsin Butcher	Tamsin.butcher@odysseyeducation.org.uk
Wokingham Referral and Assessment Team	Children's Safeguarding and Social Care Team	0118 908 8002 triage@wokingham.gov.uk
Out of hours emergency duty service	Wokingham EDS	01344 351999
Local authority designated officer	Michelle Pinnock-Ouma	Michelle.Pinnock-ouma@wokingham.gov.uk
Police	Emergency / non-emergency	999 for emergency 101 for non-emergency
NSPCC helpline	NSPCC	0808 800 5000
Proprietor	Odyssey Education Services Limited / Charu Kashyap (Chair of Proprietary Body)	charu@odysseyeducation.org.uk 07464 626 189
Independent Schools Inspectorate	ISI	0207 600 0100 concerns@isi.net

Safeguarding emails must be sent to the school safeguarding mailbox rather than to individual staff accounts. Where an individual account is used in error, the recipient must forward the information to the safeguarding mailbox and record the action taken.

2. Purpose, Scope and Policy Principles

Odyssey House School Wokingham recognises its moral and statutory responsibility to safeguard and promote the welfare of every pupil. This policy sets out how the school identifies risk, responds to concerns, records decisions, works with external agencies and holds adults to account.

The policy applies to all pupils, staff, leaders, proprietors, volunteers, supply staff, agency staff, contractors, visitors, adults using the school site and any organisation delivering activities on behalf of, or on the premises of, the school.

- Safeguarding is everyone's responsibility and is not limited to the DSL team.
- The best interests, wishes, feelings, communication needs and lived experience of the child are central to decision-making.
- Abuse, neglect and exploitation may occur inside school, outside school, online, at home, in the community or across several contexts at the same time.
- Absence, behaviour change, distress, dysregulation, anxiety, withdrawal or refusal to attend may be safeguarding indicators and must not be dismissed as only behaviour or SEND presentation.
- The school maintains a zero-tolerance approach to abuse, sexual violence, harassment, discrimination, racism, misogyny, homophobia, biphobia and harmful sexual behaviour.
- Adults must act with professional curiosity, record accurately and escalate where they remain concerned.

3. Statutory Basis and Guidance

This policy has been rewritten with regard to the guidance and requirements in force at the date of drafting, including:

- Keeping Children Safe in Education 2025, which is the current statutory guidance in force from 1 September 2025.
- Working Together to Safeguard Children 2026, including the strengthened emphasis on shared responsibility, family help, anti-discriminatory practice, multi-agency working and children facing multiple harms.
- The Education (Independent School Standards) Regulations 2014, particularly Parts 3, 4 and 8.
- The Independent School Standards guidance for independent schools, April 2026.
- The ISI inspection framework and handbook for association independent schools, September 2025.
- Working Together to Improve School Attendance, statutory guidance.
- The Prevent duty guidance and the Counter-Terrorism and Security Act 2015.

- The Children Acts 1989 and 2004, the Education Act 2002, the Human Rights Act 1998, the Equality Act 2010, UK GDPR and the Data Protection Act 2018.
- The SEND Code of Practice and relevant statutory guidance for children with SEND, medical needs, mental health needs and disabilities.

The school will review this policy immediately when the final KCSIE 2026 guidance is published or where local safeguarding procedures materially change.

4. Roles, Responsibilities and Accountability

4.1 All staff

All staff must know who the DSL and deputy DSLs are, read the required parts of KCSIE, complete safeguarding training, report concerns without delay, maintain professional boundaries and follow the staff code of conduct.

- Staff must report every concern, however small, to the DSL team and record it on CPOMS.
- Staff must not investigate concerns themselves, ask leading questions, view or forward indecent images, promise confidentiality or delay action while seeking unnecessary internal approval.
- Staff must challenge poor or unsafe practice and use the whistleblowing procedure where needed.
- Staff must understand that pupils with SEND, autism, SEMH, communication differences, trauma histories and anxiety may disclose indirectly or through behaviour.

4.2 Designated Safeguarding Lead

The DSL is a member of the senior leadership team and holds lead responsibility for child protection and wider safeguarding, including online safety and filtering and monitoring arrangements. The DSL for Wokingham is Tristan Powell, Headteacher.

- The DSL ensures concerns are triaged, recorded, risk-assessed, referred and followed up.
- The DSL liaises with children's social care, the police, Channel, the LADO, virtual school heads, placing authorities, health, therapy and other agencies.
- The DSL maintains oversight of CPOMS chronology, thresholds, escalation, pupil voice, attendance-related safeguarding, child-on-child abuse, allegations and low-level concerns patterns.
- The DSL ensures safeguarding actions are integrated with SEND, therapy, pastoral, behaviour, attendance and curriculum planning.
- The DSL provides regular safeguarding updates to the headteacher, CEO/proprietor and relevant leaders while preserving confidentiality.

4.3 Deputy DSLs

Deputy DSLs support the DSL and provide cover when the DSL is unavailable. Deputy DSLs must be trained to the same standard as required for the role and must have sufficient time and authority to act.

4.4 Proprietor and senior leaders

- The proprietor body ensures the school complies with the Independent School Standards and that safeguarding is effective in practice, not only in policy.
- The proprietor approves this policy, receives safeguarding assurance, checks implementation and ensures the DSL has the status, time, funding, training and resources needed.
- The headteacher is accountable for day-to-day implementation, including induction, staff training, safer recruitment, staff conduct, curriculum, behaviour, attendance and site safety.
- The proprietor must ensure that the person monitoring safeguarding effectiveness is not the DSL and that challenge is recorded.

4.5 SENCO, pastoral and therapy staff

The SENCO, pastoral leads, key workers and therapy staff must work with the DSL so that safeguarding concerns are understood alongside EHCP provision, communication needs, behaviour support, risk assessment, regulation plans and family or local authority work. Therapeutic or pastoral confidentiality must not prevent safeguarding information being shared with the DSL.

5. Staff Induction, Training and Professional Conduct

- All new staff, volunteers, agency staff and regular contractors receive safeguarding induction before they work unsupervised with pupils.
- Induction includes this policy, staff code of conduct, behaviour policy, online safety, filtering and monitoring expectations, CPOMS use, whistleblowing, low-level concerns, allegations, attendance safeguarding and the identity of the DSL team.
- All staff receive safeguarding and child protection training at induction and regular updates at least annually, with additional briefings where risk, guidance or local procedures change.
- DSLs and deputy DSLs receive updated training at least every two years and update knowledge and skills at least annually.
- At least one member of every recruitment panel is trained in safer recruitment.
- All staff sign an annual declaration confirming that they have read and understood the required safeguarding documents.

6. Recognising Safeguarding Concerns

Staff must be alert to signs of abuse, neglect, exploitation and contextual risk. Concerns may arise from a disclosure, observation, change in presentation, attendance pattern, injury, online incident, parental behaviour, peer relationship, professional information, police notification or external agency contact.

- Physical abuse, emotional abuse, sexual abuse and neglect.
- Domestic abuse, including children seeing, hearing or experiencing its effects.
- Child sexual exploitation, child criminal exploitation, county lines, serious violence, trafficking, modern slavery and financial exploitation.

- Child-on-child abuse, sexual violence, sexual harassment, bullying, discriminatory abuse and harmful sexual behaviour.
- Online harms, grooming, cyberbullying, pornography exposure, sharing of nudes/semi-nudes, financially motivated sexual extortion, AI-generated images and deepfakes.
- Radicalisation, extremism, conspiracy narratives and high-risk Prevent concerns.
- So-called honour-based abuse, FGM, forced marriage, faith or belief-based abuse and abuse linked to culture or community pressure.
- Mental health concerns, self-harm, suicidal ideation, trauma responses and risk-taking behaviour.
- Attendance concerns, persistent absence, EBSA, missing education, unexplained absence and repeated lateness or non-collection.

7. Responding to Concerns, Disclosures and Referrals

7.1 If a child is in immediate danger or likely to suffer significant harm

1. Call 999 where emergency help is needed.
2. Make an immediate referral to Wokingham children's social care or the relevant local authority if the child lives elsewhere.
3. Inform the DSL or deputy DSL as soon as possible.
4. Record the concern, action, decision and rationale on CPOMS on the same working day.

7.2 If a child discloses abuse or harm

- Listen carefully, remain calm and take the child seriously.
- Use open prompts only, such as 'tell me', 'explain' or 'describe'.
- Do not promise secrecy. Explain that information will be shared only with people who need to help keep the child safe.
- Record the child's words as accurately as possible, noting date, time, place, who was present and any visible injuries or demeanour.
- Report to the DSL immediately. If the DSL is unavailable and risk is urgent, make the referral directly.

7.3 Early help, family help and referrals

The DSL will consider whether the child needs school support, early help/family help, a referral to children's social care, police involvement, Channel, health input or another specialist service. The terminology used locally may vary; the safeguarding principle is that emerging need is identified early, recorded, reviewed and escalated if risk does not reduce.

- Referrals to children's social care must include the concern, known history, current risk, pupil voice, SEND/communication needs, family context, attendance information and school actions already taken.
- The DSL or referrer must follow up if the local authority decision is not received within expected timescales.

- If the school remains concerned after a decision not to proceed, leaders must use the local escalation procedure and record the rationale.

7.4 FGM mandatory reporting and forced marriage

Teachers must personally report to the police where they discover that FGM appears to have been carried out on a girl under 18. Staff must also inform the DSL unless they have been specifically instructed not to disclose. Suspected risk of FGM, forced marriage or honour-based abuse must be reported to the DSL immediately and local safeguarding procedures followed.

7.5 Prevent

Where staff are concerned that a pupil may be susceptible to radicalisation or drawn into terrorism, they must report to the DSL. The DSL will assess risk, seek advice where needed and refer to Channel, children's social care or police as appropriate. Emergency Prevent concerns require 999.

8. Attendance, Absence and Children Missing from Education

Attendance is a safeguarding matter. The school will identify, analyse and act on absence patterns, including persistent absence, sudden unexplained absence, part-time timetables, EBSA, anxiety-led non-attendance, repeated lateness, non-collection and pupils missing from education.

- First-day absence procedures must be followed and recorded.
- Unexplained or repeated absence for pupils with known safeguarding risk must be escalated to the DSL.
- Where absence suggests risk of harm, neglect, exploitation, FGM, forced marriage, radicalisation, family crisis or mental health risk, the DSL will consider referral to children's social care.
- The school will notify the local authority in line with statutory requirements when a pupil is removed from roll at a non-standard transition point or where a child is missing education.
- Part-time timetables must be time-limited, reviewed, agreed with parents/carers and placing authorities where relevant, and supported by a plan to return to full-time education unless this is not in the child's best interests.

9. SEND, SEMH, Autism, Anxiety, EBSA and Complex Needs

As a specialist independent school, Odyssey House must be able to evidence that safeguarding practice is adapted to pupils' SEND, SEMH, autism, anxiety, EBSA, trauma histories and communication profiles.

- Staff must not assume that distress, dysregulation, withdrawal, sexualised behaviour, aggression, school refusal, injury or mood change is explained by SEND without safeguarding consideration.
- Individual plans must identify communication needs, trusted adults, regulation strategies, known triggers, risk factors and escalation routes.
- The DSL, SENCO, therapy and pastoral staff must share relevant information so that safeguarding, behaviour and provision planning are coherent.

- Pupils must be offered accessible routes to report worries, including key worker conversations, visuals, adapted language, written methods or another trusted communication route.
- EHCP outcomes, risk assessments, behaviour plans and safeguarding plans must align where risk is known.
- The school will maintain professional curiosity where a pupil's needs create barriers to disclosure or where parents/carers may unintentionally or intentionally mask risk.

10. Online Safety, Filtering and Monitoring, Mobile Technology and AI

Online safety is part of safeguarding and is overseen by the DSL with support from senior leaders, IT support and the proprietor. The school addresses the four areas of online risk: content, contact, conduct and commerce.

- Filtering and monitoring systems must be appropriate to the age, needs and risk profile of pupils and must be reviewed at least annually and when concerns indicate weakness.
- The proprietor and senior leaders must know what filtering and monitoring is in place, how alerts are reviewed, who responds, and how effectiveness is checked.
- Staff training must include online safety, filtering and monitoring roles, cyber risk, social media, online grooming, sexual extortion, harmful content, misinformation, disinformation and conspiracy narratives.
- Pupils are taught safe and responsible technology use through the curriculum and pastoral/key worker work.
- Staff must not take photographs or recordings of pupils on personal devices.
- Any use of generative AI tools must be risk assessed. AI-generated sexual images, deepfakes, bullying, grooming or harmful content will be treated as safeguarding concerns.

11. Child-on-Child Abuse, Sexual Violence and Harmful Sexual Behaviour

The school recognises that child-on-child abuse can happen in any setting, including specialist settings, and may occur online, offline, in school, outside school or across several contexts. A lack of reports does not mean abuse is not happening.

- All reports of child-on-child abuse are taken seriously, recorded and risk assessed.
- Victims must be reassured, supported and protected from blame, retaliation or further harm.
- Alleged perpetrators must also be safeguarded and supported, particularly where behaviour may indicate unmet need, trauma or prior abuse.
- The DSL will consider immediate safety measures, supervision, timetable changes, transport arrangements, parent/carer contact, police/social care referral and support from specialist services.
- Sexual violence, sexual harassment and harmful sexual behaviour must be considered through safeguarding, behaviour, SEND, risk assessment and curriculum lenses.

- Incidents involving nudes/semi-nudes must be reported to the DSL. Staff must not view, copy, save, forward, print or delete images unless specifically directed by the DSL and in line with guidance.

12. Mental Health, Self-Harm and Trauma-Informed Safeguarding

Mental health concerns can be indicators of abuse, neglect, exploitation, trauma or unmet need. Staff must report mental health concerns to the DSL where there is any safeguarding element, including self-harm, suicidal ideation, significant distress, risky behaviour, disclosure of harm, family crisis or sudden change.

- The DSL will ensure appropriate safety planning, parent/carer communication where safe, health referral, social care referral or emergency action.
- Staff must not allow trauma-informed practice to reduce safeguarding thresholds. Understanding behaviour is not a substitute for acting on risk.
- Records must distinguish between observed facts, pupil voice, staff interpretation, professional advice, actions and review dates.

13. Information Sharing, Confidentiality and Safeguarding Records

Timely information sharing is essential to safeguarding. UK GDPR and the Data Protection Act 2018 do not prevent information being shared to keep children safe. Staff must never promise confidentiality to a child.

- Safeguarding records are held securely on CPOMS and are separate from the main pupil file.
- Records must include a clear summary of the concern, the child's voice, context, actions, decisions, rationale, referrals, responses, outcomes and review dates.
- The DSL must monitor chronologies and patterns, including repeated low-level concerns, attendance concerns, behaviour incidents, online alerts and peer issues.
- Where a pupil transfers to another setting, the child protection file must be transferred securely and separately within the required timescale, with direct DSL-to-DSL discussion for significant or complex cases.
- Information is shared on a need-to-know basis, but safeguarding need overrides general preference for confidentiality where a child is at risk.

14. Allegations, Low-Level Concerns and Whistleblowing

All concerns about adults working in or on behalf of the school must be reported. This includes staff, leaders, supply staff, agency workers, contractors, volunteers, visitors and adults using the site.

14.1 Allegations that may meet the harm threshold

An allegation may meet the harm threshold where an adult has behaved in a way that has harmed or may have harmed a child, possibly committed a criminal offence against or related to a child, behaved in a way indicating they may pose a risk of harm to children, or behaved in a way indicating they may not be suitable to work with children.

- Allegations against staff are reported to the headteacher unless the allegation concerns the headteacher.
- Allegations against the headteacher are reported to the proprietor/CEO.
- The case manager must consult the LADO where the threshold may be met or where there is doubt.
- Suspension is not the default position and must be considered only after alternatives and risk have been assessed with appropriate advice.
- Records must include decisions, rationale, actions, external advice, outcomes, support for the child and support for the adult.

14.2 Low-level concerns

A 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 but does not meet the harm threshold.

- Staff must report low-level concerns and may self-refer.
- The headteacher is the decision-maker for low-level concerns unless the concern is about the headteacher.
- Low-level concerns are recorded confidentially and reviewed for patterns.
- Where a pattern suggests risk or the threshold is met, the matter must be referred to the LADO.
- Concerns about supply staff or contractors must also be shared with their employer as appropriate.

14.3 Whistleblowing

Staff must use the whistleblowing procedure where they believe safeguarding practice is unsafe, concerns are not being acted on, records are inaccurate, leaders are failing to follow procedure or there is a culture preventing concerns being raised.

15. Safer Recruitment, Visitors, Contractors and Use of Premises

The school follows safer recruitment requirements in KCSIE and records required checks on the single central record. The SCR must be accurate, complete, up to date and regularly quality assured by someone with appropriate knowledge.

- Recruitment adverts and application packs make the school's safeguarding commitment clear.
- Shortlisting includes scrutiny of gaps, inconsistencies and suitability concerns.
- Online searches may be carried out for shortlisted candidates and candidates are informed of this.
- References are obtained, verified and explored before appointment wherever possible.
- Pre-appointment checks include identity, right to work, enhanced DBS and barred list where applicable, prohibition from teaching where applicable, qualifications, health and overseas checks where relevant.

- Supply staff and contractors are checked through written assurance and identity verification on arrival.
- Visitors sign in, wear identification and are supervised unless suitability has been verified and supervision is not required.
- Any external provider using the school site must have appropriate safeguarding arrangements, and use of premises must be stopped if safeguarding requirements are not met.

16. Curriculum, Pupil Voice, Parents and External Agencies

- The curriculum teaches pupils about healthy relationships, consent, boundaries, online safety, discrimination, bullying, exploitation, reporting worries and how to seek help.
- Pupils must know who they can speak to and have accessible reporting routes that suit their communication and regulation needs.
- The school will usually work openly with parents/carers, unless doing so would place the child or another person at greater risk, undermine a police/social care process or increase risk of significant harm.
- The school works with social workers, placing authorities, virtual school heads, health, therapy, police, Channel, LADO and local safeguarding partners as required.
- Where parents/carers express an intention to electively home educate a pupil, leaders will consider safeguarding, SEND, attendance and welfare context and liaise with the local authority as appropriate.

17. Monitoring, Quality Assurance and Policy Review

The proprietor and senior leaders must assure themselves that safeguarding is effective in practice. This means testing implementation, not only checking that a policy exists.

- Safeguarding policy review takes place annually and earlier where statutory guidance, local procedure, school practice or risk changes.
- The proprietor receives safeguarding assurance reports covering training, referrals, CPOMS quality, attendance safeguarding, allegations, low-level concerns, child-on-child abuse, online safety, SCR checks, pupils with social workers and audit actions.
- The DSL completes regular quality assurance of safeguarding records and checks that actions are followed up.
- Leaders analyse safeguarding data for trends, disproportionality, cohort risk and impact of support.
- Learning from incidents, complaints, referrals, allegations, pupil voice and audits is recorded and used to improve practice.

Linked policies include behaviour, attendance, anti-bullying, staff code of conduct, whistleblowing, complaints, online safety, acceptable use, mobile phones, data protection, SEND, curriculum, RSHE, health and safety, first aid, medicines and safer recruitment.

Appendix A: Staff Safeguarding Action Card

Situation	Action
Immediate danger	Call 999. Inform DSL. Record on CPOMS.
Disclosure from a child	Listen, reassure, avoid leading questions, explain sharing, record exact words, report immediately.
Concern without disclosure	Record facts, pupil voice and context. Report to DSL the same day.
DSL unavailable	Do not delay. Contact deputy DSL, headteacher, social care or police as risk requires.
Concern about adult	Report to headteacher/proprietor as appropriate. Use LADO route where threshold may be met.
Low-level concern	Report and record in line with staff code of conduct and low-level concern procedure.
Indecent image / nude or semi-nude	Do not view, save, share, print, forward or delete. Report to DSL immediately.
Dissatisfied with response	Escalate to DSL, headteacher, proprietor, LADO, social care or whistleblowing route as appropriate.

Appendix B: Safeguarding Record Quality Standard

- Record the date, time, location and people present.
- Separate fact, child voice, professional judgement and action.
- Use the child's own words where possible.
- Avoid diagnosis, assumption or minimising language.
- Record body maps or injuries in line with school procedure; do not photograph injuries unless policy and safeguarding advice permit it.
- Record referrals, advice sought, decisions, rationale, parent/carers contact, review dates and outcomes.
- Update chronologies so patterns can be seen.
- Close the loop: every concern must show what happened next or why no further action was taken.

Appendix C: Safer Recruitment and SCR Checklist

Check	Expected evidence
Identity	Verified before appointment and recorded.
Enhanced DBS	Appropriate level obtained; barred list where regulated activity applies.

Children's barred list	Completed before regulated activity begins, including separate check if DBS delayed.
Right to work	Verified and retained in line with requirements.
Prohibition from teaching	Checked for relevant teaching roles.
Section 128	Checked where required for management roles in independent schools.
Qualifications	Verified where required for role.
Overseas checks	Completed where applicant has lived or worked outside the UK as appropriate.
References	Obtained, verified, scrutinised and concerns resolved.
Medical fitness	Confirmed for role.
Agency/supply assurance	Written confirmation of checks and identity check on arrival.
SCR quality assurance	Regular documented audit, with actions tracked to completion.

Appendix D: Specific Safeguarding Issues

This appendix summarises issues staff must recognise and report. It does not replace training or KCSIE.

Abuse and neglect

Physical abuse, emotional abuse, sexual abuse and neglect may overlap. Staff must report concerns even where evidence is partial or the child has not disclosed.

Domestic abuse

Children who see, hear or experience domestic abuse are victims in their own right. Operation Encompass or police notifications must be reviewed by the DSL and recorded.

Exploitation

CCE, CSE, county lines, modern slavery, trafficking and serious violence may involve coercion, debt, threats, gifts, older peers or adults, online contact and missing episodes.

Online sexual extortion

Adult-involved nude or semi-nude incidents, including financially motivated sexual extortion, are child sexual abuse concerns and require immediate DSL action and referral consideration.

Honour-based abuse

FGM, forced marriage and faith or belief-based abuse require urgent safeguarding action. Staff must not contact family members where this may increase risk.

Radicalisation and extremism

Staff must report concerns about susceptibility to radicalisation, extremist ideology, conspiracy narratives or terrorist-related risk to the DSL.

Children absent from education

Repeated or unexplained absence can indicate abuse, neglect, exploitation, mental health risk, FGM, forced marriage or family crisis.

Looked-after and previously looked-after children

The DSL and designated teacher must understand care status, social worker details, virtual school involvement, contact arrangements and safeguarding implications.

Appendix E: Annual Staff Safeguarding Declaration

Name: _____ Role:

I confirm that I have read, understood and will follow:

- The Child Protection and Safeguarding Policy.
- Keeping Children Safe in Education 2025 Part One and, where required by the school, Annex B.
- The Staff Code of Conduct.
- The Behaviour Policy, Attendance Policy, Whistleblowing Policy and Online Safety / Acceptable Use requirements.
- The school's procedures for reporting concerns about pupils and adults, including low-level concerns and allegations.

I understand who the DSL and deputy DSLs are, how to record concerns, how to escalate concerns, and that safeguarding is my responsibility.

Signature: _____ Date:
