Child Protection and Safeguarding Policy

POLICY

"The Journey is Everything"

Odyssey House School **Wokingham**	**Child-Centric** **Excellence** **Ownership**	**Nurturing** **Innovation** **Agility**

Child Protection and Safeguarding Policy - Quick Glance

Key information for staff, leaders and stakeholders. The full policy follows this summary and remains the authoritative policy text.

Policy Owner	Designated Safeguarding Lead / Headteacher - Tristan Powell
Operational Lead	Designated Safeguarding Lead / Headteacher
Approval Body	Proprietary Body
Date	1 September 2026
Version	D0.26
Review Frequency	At least annually
Next Review	August 2027 or earlier on trigger
Applies To	Odyssey House School, Wokingham

At a glance

Purpose	Keep every child safe through prompt, child-centred safeguarding action and clear accountability.
Who it supports	All pupils. The policy applies to staff, leaders, proprietors, volunteers, agency and supply staff, contractors, visitors and organisations working on behalf of or on the school premises.
Core approach	Recognise -> Respond -> Record -> Report -> Review. Safeguarding is everyone's responsibility; concerns are acted on promptly, recorded accurately and escalated where required.
Key priorities	Immediate safeguarding action; accessible reporting for SEND pupils; attendance safeguarding; online safety and AI; child-on-child abuse; mental health; information sharing; safer recruitment; allegations and low-level concerns.
Curriculum leadership	The DSL leads safeguarding, supported by deputy DSLs, the Headteacher and senior leaders. The Proprietary Body provides oversight, challenge and assurance.

Monitoring and evidence	CPOMS records, safeguarding referrals, staff training and KCSIE reading, filtering and monitoring review, SCR audit, pupil voice, file-transfer checks, allegations/low-level concerns and proprietor assurance.
Review	Reviewed at least annually and earlier where statutory guidance, local procedures, school practice, risk or assurance findings change.

Linked policies: Behaviour; Attendance; Anti-Bullying; Staff Code of Conduct; Whistleblowing; Online Safety / Acceptable Use; Mobile Phones; Data Protection; SEND; Curriculum; RSHE; Health & Safety; First Aid; Medicines; Safer Recruitment.

What Has Changed?

KCSIE 2026 replaces KCSIE 2025 for operation from 1 September 2026; every staff group must read Part One in full.

Working Together 2026 terminology and Family Help pathways are clarified.

DSL cover, information sharing and safeguarding-file transfer controls are strengthened.

Filtering and monitoring review, generative AI, mobile phone, premises and information-security controls are updated.

Safer recruitment reflects removal of the regulated-activity supervision exemption and expanded trainee-teacher/third-party responsibilities.

Child-on-child abuse, harmful sexual behaviour, nudes/semi-nudes, mental health, medical conditions, young carers and SEND vulnerabilities are updated.

Approval, implementation, training, evidence and website actions are explicitly recorded as conditions before release.

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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
Director in charge of safeguarding	David Coulter	david.coulter @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 2026, published 7 July 2026 and effective from 1 September 2026.
- 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, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.
- The SEND Code of Practice and relevant statutory guidance for children with SEND, medical needs, mental health needs and disabilities.

KCSIE 2025 is superseded for operation from 1 September 2026. This policy must be reviewed early where KCSIE, legislation, local safeguarding arrangements, school practice, risk or assurance findings change.

4. Roles, Responsibilities and Accountability

4.1 All staff

All staff must know who the DSL and deputy DSLs are, read KCSIE 2026 Part One in full, complete safeguarding training, report concerns without delay, maintain professional boundaries and follow the staff code of conduct. This applies to staff who work directly and indirectly with children.

- 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. Before 1 September 2026, all staff must receive KCSIE 2026 implementation briefing and confirm that they have read Part One in full.
- 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 Universal and community support, targeted early help and Family Help

The DSL will consider whether the child needs universal or community-based support, targeted early help through Family Help, statutory Family Help under section 17, a referral to children's social care, police involvement, Channel, health input or another specialist service. The locally applicable Wokingham assessment and escalation pathway must be verified and followed.

- 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 pupils' age, needs and risk profile. Their effectiveness must be reviewed and recorded at least once every academic year by the responsible SLT member with support from the DSL and IT. Checks must cover all internet-connected devices in all relevant locations, with actions tracked to completion.
- 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 against DfE safety guidance. AI-generated or digitally altered nude or semi-nude images, deepfakes, bullying, grooming or harmful content are safeguarding concerns and require immediate DSL action.

The mobile phone policy must reflect the statutory guidance to be followed from 1 September 2026 while providing documented reasonable adjustments for disability, medical need and safeguarding risk. Confiscation or searching must follow the behaviour policy and must never obstruct urgent safeguarding reporting.

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.

Child-on-child abuse is preventable and exists on a continuum from concerning and harmful sexual behaviour to sexual violence. Risk assessment must consider serious physical harm, threats or use of weapons, coercion, online/offline overlap and the safeguarding needs of both the child harmed and the alleged perpetrator.

- 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.

Any use of reasonable force, seclusion, restraint or immobilisation must follow the current restrictive-intervention procedure and statutory recording/reporting requirements. Decisions must be necessary, proportionate, attentive to SEND and trauma, followed by safeguarding review and debrief, and included in proprietor trend assurance.

- Every incident involving the making or sharing of nudes or semi-nudes requires a safeguarding response, whether described as consensual or non-consensual. Staff must not view, copy, save, forward, print or delete images unless specifically directed by the DSL in line with current 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.

Young carers and pupils with medical conditions may face additional safeguarding barriers. Staff must consider missed treatment, fabricated or induced illness, parent/carer capacity, communication needs, attendance and the interaction between health plans, EHCP provision and safeguarding risk.

- 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, including an in-year move, the child protection file must be transferred securely and separately as soon as possible and within five days. Receipt must be confirmed. The transfer must include a structured summary of current concerns, relevant context and ongoing support, distinguish current risk from historic information, and be reviewed promptly by an appropriately trained person at the receiving setting.
- 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, trainee teachers, 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 harm threshold may be met or where there is doubt, and must consider a LADO referral in line with KCSIE 2026 and local procedures.
- 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 2026 and records required checks on the single central record. From 1 September 2026, no procedure may rely on the former regulated-activity supervision exemption. Volunteer, work-experience and supervised roles must be re-mapped against the current regulated-activity definition and DBS/barred-list eligibility before deployment.

- 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.

Safeguarding arrangements must cover sport, lettings and any non-school activity on the premises. The school must obtain and assess provider arrangements, act on concerns and terminate use where 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 annual assurance cycle must include evidence of staff Part One reading, safeguarding understanding checks, DSL cover, file-transfer timeliness, information-sharing decisions, filtering and monitoring review, SCR audit, volunteer role mapping, restrictive-intervention records, local referral escalation, pupil voice and website/master parity.

- 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.

Version History

Version	Date	Change	Author / owner	Approved by
D0.1	26 Aug 2026	KCSIE 2026 and September readiness revision	Odyssey Policy Governance / DSL [TO BE CONFIRMED]	Not approved

Traceability Matrix

Obligation	Authority	Policy clause	Procedure / evidence	Owner	Status
KCSIE 2026 Part One reading	KCSIE 2026 paras 11-13	Sections 4.1 and 5; Appendix E	Reading record and understanding check	DSL / training lead	CONFIRMATION REQUIRED
DSL cover	KCSIE 2026 para 127 and Annex B	Sections 4.2-4.3	Cover rota and monitored mailbox log	Headteacher / DSL	CONFIRMATION REQUIRED

Obligation	Authority	Policy clause	Procedure / evidence	Owner	Status
Filtering and monitoring	KCSIE 2026 para 171	Section 10	Annual review, device/location checks, action log	SLT owner / DSL / IT	CONFIRMATION REQUIRED
Safer recruitment	KCSIE 2026 Part Three	Section 15; Appendix C	Role map, DBS/barred-list checks, SCR audit	HR / SCR owner	CONFIRMATION REQUIRED
Child-on-child abuse	KCSIE 2026 Parts One, Two and Five	Section 11	Risk assessments, records, support plans and review	DSL	PARTIALLY MET
SEND and medical conditions	KCSIE 2026 paras 224-250	Sections 9 and 12	Accessible reporting, linked plans, audit and pupil voice	DSL / SENCO	PARTIALLY MET
Proprietor assurance	ISS Part 8	Sections 4.4 and 17	Recorded challenge, dashboard, audit closure and impact	Proprietor body	CONFIRMATION REQUIRED

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/carer 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 2026 Part One in full.
- 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: _____

Approval and Implementation Conditions

Confirm the registered establishment details, DSL/DDSL appointments, safeguarding mailbox, local social-care and LADO contacts, proprietor identity and all procedure links.

Record proprietor-body approval and challenge. Do not mark this policy LIVE on the basis of an individual name in an earlier document.

Complete staff KCSIE 2026 Part One reading, training, knowledge checks and declarations before staff work with pupils after 1 September.

Complete and evidence the SCR/volunteer role review and filtering/monitoring effectiveness review before pupils return.

Publish the approved version and remove or mark the July 2026 website copy as superseded.

Provide proprietor assurance of policy, procedure, practice, evidence, leadership knowledge and pupil impact within the first half term.

Odyssey Policy at a Glance

Recognise -> Respond -> Record -> Report -> Review

PURPOSE	Keep every child safe through prompt, child-centred action.
RECOGNISE	Notice changes, disclosures, absence, distress, online harm, exploitation and adult-conduct concerns. SEND must never be used to explain away risk.
RESPOND	Listen, reassure, do not investigate or promise secrecy. Call 999 for immediate danger.
RECORD	Use the child's words, separate fact from judgement, record decisions, rationale, referrals, outcomes and review dates.
REPORT	Tell the DSL/deputy immediately and use CPOMS on the same working day. Do not wait if the DSL is unavailable.
ESCALATE	Use social care, police, LADO, Channel or whistleblowing routes where risk or professional concern requires it.
REMEMBER	All staff read KCSIE 2026 Part One in full. Safeguarding is everyone's responsibility.
ASSURE	Leaders test practice, evidence, staff knowledge, proprietor challenge and pupil impact; website publication is not proof of implementation.

This summary does not replace the full policy, staff training, KCSIE 2026 Part One or professional judgement.