Wembley Multi-Academy Trust

ACHIEVEMENT FOR ALL

WEMBLEY HIGH TECHNOLOGY COLLEGE

SAFEGUARDING POLICY

Policy reference	WHTC- 05
Policy owner	Headteacher
Policy version	0.02
Date updated	September 2026
Approved by	Board of Trustees
Date approved	September 2026
Date of next review	September 2027

WEMBLEY HIGH TECHNOLOGY COLLEGE MISSION STATEMENT:

Our mission is to deliver **'Achievement for All', one child at a time**, creating a dynamic and inclusive environment in which every student is protected, valued and empowered to achieve their full potential. Guided by our commitment to equal opportunity and ambition for all, we recognise that children can only thrive academically and personally when they feel safe, supported and able to seek help.

Safeguarding is the responsibility of **every member of staff**. Through strong leadership, high-quality training and a proactive approach, we aim to ensure that concerns are recognised early, acted upon promptly and responded to consistently. We are committed to creating an environment in which wellbeing is prioritised, vulnerability is met with care, and children feel confident that they will be listened to and taken seriously.

Our safeguarding culture goes beyond compliance. We seek to embed safeguarding in every aspect of school life so that pupils feel able to raise concerns, ask for help and trust the adults around them. Through our values of hard work, ambition, resilience, empowerment, diversity and helping others, we aim to create the conditions in which every child can feel safe, belong and succeed.



KEY CONTACTS

WHTC Safeguarding email	safeguarding@whtc.co.uk
WHTC Designated Safeguarding Lead	ckenny@whtc.co.uk
WHTC Headteacher	reception@whtc.co.uk (FAO Headteacher)
WHTC Chair of Governors email	chair@whtc.co.uk
WMAT Chair of Trustees email	chair@wmat.co.uk
Brent Family Front Door	020 8937 4300 (option 1); family.frontdoor@brent.gov.uk
Emergency Out of Hours Duty Line	020 8863 5250
Brent LADO	Via Family Front Door: 020 8937 4300 (option 1)
Police	999 - emergency / immediate danger; 101 - non-emergency

Name	Role
Thomas Best	Headteacher
Christopher Kenny	Designated Safeguarding Lead (DSL)
Aimen Nasir	Deputy DSL — Year 7 / Medical
Eloise Hewston	Deputy DSL — Year 8 / Attendance
Kim Brooker	Deputy DSL — Years 9–10
Simran Dulai	Deputy DSL — Years 11–13
Alison Brannick	WMAT Nominated Trustee for Safeguarding

Contents

The main policy contains the procedures staff and leaders need to use. Detailed definitions and quick-reference material are placed in the appendices, so the policy remains operational and easy to navigate.

1. Status, purpose and scope 3
2. Key safeguarding contacts 3
3. Staff safeguarding action guide 3
4. Safeguarding principles and culture 5
5. Roles and responsibilities 5
6. Responding to concerns about a child 6
7. Recording, information sharing and child protection files 8
8. Children who may be at greater risk of harm 8
9. Child-on-child abuse, harassment and violence 9
10. Online safety, filtering and monitoring 10
11. Preventing radicalisation and the Prevent duty 11
12. Specific safeguarding duties and harms 12
13. Concerns and allegations about adults 13
14. Safer recruitment and ongoing suitability 14
15. Reasonable force and restrictive intervention 14
16. Premises, external providers and alternative provision 14
17. Training, induction and teaching safeguarding 15
18. Governance, quality assurance and review 16
19. Related policies and statutory guidance 16

APPENDIX A - Definitions and possible indicators 18
APPENDIX B - Staff quick-response procedures 22
APPENDIX C - Child-on-child abuse response framework 23
APPENDIX D - Local referral routes and external contacts 24
APPENDIX E - Role of the DSL and Deputy DSLs 25
APPENDIX F - KCSIE 2026 Quick Reference Index 26

1. Status, purpose and scope

This is Wembley High Technology College's child protection policy for the purposes of KCSIE. It applies to all pupils and students under 18 who attend the school, including sixth-form students, and to all adults working for or on behalf of the school: employees, agency and supply staff, trainee teachers, volunteers, contractors, governors/trustees and visitors.

The policy should be read alongside KCSIE 2026, Working Together to Safeguard Children 2026, locally agreed Brent multi-agency safeguarding arrangements and the related WMAT/WHTC policies listed in section 19. Where statutory guidance changes, the statutory guidance takes precedence and this policy will be updated promptly.

For this policy, "child" means anyone under the age of 18. Safeguarding and promoting welfare means providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online; preventing impairment of mental or physical health or development; ensuring safe and effective care; and taking action to enable the best outcomes.

Non-negotiable principle
Safeguarding is everyone's responsibility. Staff must maintain an attitude of "it could happen here", act in the child's best interests, share concerns promptly and never assume somebody else will act.

2. Key safeguarding contacts

Named WHTC safeguarding contacts are set out on page 2. Local referral routes and external contacts are in Appendix D.

Named safeguarding contacts are set out at the front of this policy. The DSL or an appropriately trained deputy is available during school hours. WHTC maintains robust cover arrangements, including the safeguarding inbox, so concerns are not delayed when an individual DSL is unavailable.

The DSL remains the lead professional for safeguarding in school. Welfare and pastoral staff support safeguarding activity but do not replace the DSL/DDSL function unless formally trained and designated.

3. Staff safeguarding action guide

If this happens…	What you must do	Who to contact
You are worried about a child	Report the concern immediately. If urgent, speak to someone before recording it. Make a clear, factual record on CPOMS as soon as possible.	DSL: Christopher Kenny or any DDSL: Aimen Nasir, Eloise Hewston, Kim Brooker or Simran Dulai. Safeguarding inbox: safeguarding@whtc.co.uk. DSL mobile: 07943 077 246
A child is in immediate danger, there is an immediate risk to life, or a serious crime is happening	Take immediate action to keep the child safe and call 999. Do not wait for permission from the DSL.	Police/emergency services: 999, then notify the DSL/DDSL as soon as it is safe to do so.
A child makes a disclosure of abuse, neglect or exploitation	Stay calm and listen. Take them seriously. Do not promise confidentiality, investigate or ask leading questions. Explain that you need to share the information to keep them safe. Report immediately and record the child's own words.	DSL/DDSL immediately, followed by a factual CPOMS record.

The DSL is unavailable and you have an urgent safeguarding concern	Do not leave the concern until later. First seek another member of the safeguarding/senior leadership team. In the extremely unlikely circumstances that no appropriate senior member of staff can be reached and the concern cannot safely wait, call Family Front Door. Staff do not need permission to contact Children's Social Care and must never delay action where a child may be at risk.	1. DDSL → 2. Headteacher → if nobody can be reached and action cannot wait, Brent Family Front Door: 020 8937 4300 (option 1) / Out of hours: 020 8863 5250. If there is immediate danger, call 999.
You have a concern about another member of staff, supply/agency worker, trainee, volunteer, contractor or visitor	Report it immediately. Do not investigate it yourself or discuss it widely. This includes concerns that appear minor or cause only a sense of unease.	Headteacher: Thomas Best and DSL: Christopher Kenny. If the concern relates to the DSL or informing the DSL would create a conflict, report to the Headteacher only.
You have a low-level concern about an adult's conduct.	Report it promptly. Low-level does not mean insignificant. Patterns of apparently minor behaviour can be important. Do not decide yourself that something is too minor to report.	Headteacher and DSL, in accordance with the school's safeguarding procedure.
Your concern is about the Headteacher.	Do not report the concern to the Headteacher or attempt to investigate it.	Chair of Governors: chair@whtc.co.uk.
There is a conflict of interest which prevents the normal reporting route being used.	Do not allow the conflict to prevent or delay reporting.	Brent LADO directly, and an appropriate senior Trust officer/CEO/Chair of Trustees where applicable.
You become aware of child-on-child abuse, sexual harassment or sexual violence.	Treat it as a safeguarding concern, not simply a behaviour issue. Take the report seriously, protect the child from immediate harm and avoid unnecessary repeated retelling.	DSL/DDSL immediately. The DSL will lead the safeguarding response and consider police/Children's Social Care involvement.
You become aware of a nude/semi-nude or sexual image involving a child, including an AI-generated/deepfake image.	Do not view, copy, print, share, forward, save or store the image. Do not ask a pupil to send it to you. Secure the situation/device if necessary and report immediately.	DSL immediately.
You are concerned that a child may be at risk of radicalisation or extremism.	Treat it as a safeguarding concern. Do not investigate or make assumptions based on religion, ethnicity or political views.	DSL/DDSL, who will consider the appropriate Prevent/Channel route.
You are concerned about forced marriage or so-called honour-based abuse.	Report immediately. Do not contact, mediate with or alert family members where this could increase the risk.	DSL/DDSL immediately.
You are a teacher and a girl under 18 tells you that FGM has been carried out on her, or you otherwise discover that it appears to have been carried out.	You have a personal legal duty to report this to the police. Do not physically examine the child.	Police, and also inform the DSL.
You believe a safeguarding concern is not being acted upon, is being suppressed, or safeguarding practice is unsafe.	Escalate the concern. Staff must not assume that somebody else will deal with it. Use the Trust's whistleblowing procedure where appropriate.	DSL/Headteacher, appropriate Trust leadership, or the external whistleblowing route where necessary. If you do not feel you can discuss with the DSL/Headteacher, contact the Chair of Governors at chair@whtc.co.uk. You can also call the NSPCC whistleblowing adviceline on 0800 028 0285

Recording does not replace action
A CPOMS entry is an important safeguarding record, but it is not an emergency notification system. Urgent concerns must be verbally brought to the DSL/DDSL without delay. If a child needs immediate protection, call emergency services/Children's Social Care as appropriate and then record what happened

4. Safeguarding principles and culture

WHTC's approach is child-centred, coordinated and based on professional curiosity. We listen to children, take concerns seriously, create accessible ways to report worries and seek the child's wishes and feelings when deciding what action to take. A child's view informs decision-making but does not prevent adults taking protective action when required.

- Always see the child first and consider what is in their best interests.
- Never do nothing: act early, record accurately and follow up until the child's situation improves.
- Build trusted relationships while maintaining professional boundaries.
- Recognise that harm can occur at home, in school, in the community, in relationships and online, and that harms often overlap.
- Challenge discrimination, prejudice, sexual harassment, misogyny, misandry, racism and other behaviours that can create unsafe cultures.
- Do not allow a lack of disclosure, a child's age, SEND, communication need, gender, sexuality, faith, ethnicity or family circumstances to reduce professional curiosity.
- Work with parents and carers wherever safe and appropriate, but never where doing so may place a child at additional risk, prejudice an investigation or undermine a protection plan.
- Share information proportionately and lawfully when it is necessary to safeguard a child.

The school promotes systems that are well publicised, easy to understand and easy for children to access, including trusted adults, the safeguarding team, pastoral/welfare routes, safeguarding email routes and opportunities for confidential or anonymous reporting. Student voice is used to identify unsafe spaces, emerging harms and barriers to reporting, and leaders act on themes identified.

5. Roles and responsibilities

5.1 All staff and adults in school

- Read KCSIE Part One in full. School leaders and staff who work directly with children should also read KCSIE Annex A. All staff must understand this policy, the behaviour policy, staff code of conduct and safeguarding response to absence from education.
- Complete induction and ongoing safeguarding training, including online safety, filtering and monitoring expectations and Prevent awareness as relevant to role.
- Be alert to indicators of abuse, neglect, exploitation and other safeguarding concerns, including changes in attendance, presentation, behaviour, relationships, online activity or emotional wellbeing.
- Act immediately on concerns, report to the DSL/DDSL and make an accurate record. Any member of staff may refer directly to Children's Social Care if necessary.
- Know how to respond to a disclosure and maintain only appropriate confidentiality; never promise secrecy.
- Support social workers and other agencies following a referral or statutory assessment when requested.
- Report any safeguarding concern about an adult, no matter how small, through the route in section 13.
- Understand that professional boundaries and safer working practice are governed by the WMAT Staff Code of Conduct.

5.2 Designated Safeguarding Lead and deputies

The DSL is a member of the senior leadership team with lead responsibility for safeguarding and child protection, including online safety and an explicit lead role in understanding the school's filtering and monitoring arrangements. The DSL has sufficient status, authority, time, training, funding and resources to fulfil the role. DDSLs are trained to the same standard and can carry out delegated functions; ultimate lead responsibility remains with the DSL.

The detailed role is set out in Appendix E. It includes managing referrals, working with agencies, managing child protection files, information sharing, supporting staff, understanding children's views, raising awareness and ensuring the policy is reviewed and publicly available.

5.3 Headteacher

- Ensures policies and procedures adopted by the Trust are understood and followed by staff.
- Provides appropriate safeguarding staffing, training, time, resources and cover.
- Retains overall responsibility for the management of safeguarding allegations and concerns about adults unless the concern relates to the Headteacher. The DSL may lead the operational safeguarding response and liaison with the LADO/other agencies, keeping the Headteacher informed throughout.
- Ensures safer recruitment, single central record and ongoing suitability processes are effective.
- Ensures safeguarding is integrated into behaviour, attendance, curriculum, SEND, online safety, premises, alternative provision and wider school operations.

5.4 Trust Board / governing body

- Holds strategic responsibility for ensuring WHTC complies with safeguarding duties and KCSIE.
- Ensures there is an effective child protection policy, staff code of conduct, behaviour policy and safeguarding response to children absent from education.
- Appoints an appropriately senior DSL and ensures the role is properly resourced and covered.
- Receives regular safeguarding assurance and challenge, including training, safer recruitment, online safety, filtering and monitoring, child-on-child abuse and local safeguarding themes.
- Ensures appropriate arrangements for premises hire, contractors, volunteers and alternative provision.
- Ensures safeguarding and child protection training for trustees/governors is appropriate and regularly updated.

6. Responding to concerns about a child

6.1 Immediate response

If a child is in immediate danger or at risk of immediate serious harm, staff should make a referral to Children's Social Care and/or the police immediately. If a crime is in progress or life is at risk, call 999. The DSL should be informed as soon as it is safe to do so, but DSL availability must never delay emergency action.

6.2 When a concern arises

1. Listen to and observe the child. Take the concern seriously, including concerns arising from behaviour, attendance, online activity or information from another person.
2. Share the concern with the DSL or a DDSL immediately. If the concern is urgent, do this verbally before completing the written record.
3. Record the concern on CPOMS as soon as practicable. Record facts, the child's own words, relevant context, action taken and who was informed; distinguish observation, professional opinion and historic information.
4. The DSL/DDSL considers immediate safety, the child's wishes and feelings, known history, siblings/other children, extra-familial contexts, whether parents can safely be informed, and what level of help/protection is required.

5. The DSL/DDSL decides whether the response should be school-based support, Family Help/early help, referral under section 17, referral under section 47, police action or another specialist route. Where thresholds are uncertain, the DSL seeks advice from the Family Front Door without delaying action.
6. The response is followed through. The referrer/DSL must obtain and record the outcome, challenge delay or insufficient action, and escalate if the child's situation is not improving.

6.3 Help and statutory intervention

WHTC will provide or coordinate help as soon as problems emerge. In line with Working Together 2026, this may include universal/community support, targeted early help/Family Help and, where the statutory threshold is met, Children Act 1989 assessment and intervention.

Level	School response
School / universal support	Identify need early; agree support with child/family; review impact; escalate if needs persist or risk increases.
Targeted early help / Family Help	DSL or appropriate lead practitioner liaises with Brent and partner agencies, contributes to assessment/planning and keeps progress under review.
Section 17 — child in need	Refer to Children's Social Care where a child's health/development is unlikely to be achieved or maintained without services, or the child is disabled and statutory support may be required.
Section 47 — significant harm	Refer immediately where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm. Staff support strategy discussions, enquiries and child protection processes as required.
Police / emergency response	Call 999 for immediate danger. Police may also be involved where a crime may have been committed, including sexual violence, serious violence, weapons or other offences.

Any staff member may make a referral directly to Children's Social Care. Staff do not need the DSL's permission where they believe referral is necessary, particularly if the DSL cannot be contacted or a delay would increase risk. Where possible, the DSL should be informed so the school can coordinate support.

6.4 Working with parents and carers

Parents/carers will normally be informed and involved at the earliest opportunity because effective safeguarding usually requires partnership. The school may decide not to inform a parent/carer before referral or action where doing so could increase risk to the child or another person, lead to evidence being lost, interfere with a police/social care investigation, expose the child to coercion or retaliation, or be contrary to professional advice. The rationale must be recorded.

6.5 Responding to a disclosure

- Stay calm, listen carefully and take the child seriously.
- Do not promise confidentiality. Explain that information must be shared with people who can help keep them safe.
- Use the child's language and do not investigate. Avoid leading questions; only use open prompts where necessary to clarify immediate safety.
- Do not ask the child to repeat the account to multiple adults unnecessarily.
- Reassure the child that they have done the right thing by telling someone and that the abuse is not their responsibility.
- Explain what will happen next, in a way appropriate to the child's age and communication needs.
- Tell the DSL/DDSL immediately and make a contemporaneous record using the child's own words as far as possible.

7. Recording, information sharing and child protection files

7.1 Recording standards

All concerns, discussions, decisions, reasons for decisions, actions and outcomes must be recorded. WHTC uses CPOMS as the principal safeguarding recording system. Safeguarding records are confidential, access-controlled and retained separately from the ordinary educational record as required.

- Records should be timely, clear, factual and sufficiently detailed to show what was known, what was decided, why and what happened next.
- Record the source of information and distinguish observed fact, the child's/another person's account, professional opinion and historic information.
- Use the child's own words for significant disclosures where possible; avoid euphemism or minimising language.
- Record attempts to contact parents/agencies, advice received, referral details, outcomes and follow-up.
- Never delete or alter a safeguarding record to obscure the original entry. Corrections or subsequent information should be clearly dated and attributable.

7.2 Information sharing and confidentiality

Safeguarding information is shared on a need-to-know basis, proportionately and securely. Data protection law — including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 — does not prevent the sharing of information for safeguarding. The safety and welfare of children must not be undermined by unnecessary fear about data protection.

Consent is not always required to share personal information for safeguarding. Staff should seek advice from the DSL where uncertain, but must not delay information sharing where a child may be at risk. Decisions to share or not share and the reasons should be recorded.

7.3 Child protection file transfer

When a child leaves WHTC, the DSL/DDSL will transfer the child protection file securely to the new school/college as soon as possible and within five days for an in-year transfer, or within the first five days of the start of a new term. It is transferred separately from the main pupil file and receipt is confirmed. The export will include a clear structured summary of key concerns and actions.

Where information is needed so that the receiving setting can assess risk or put support in place before arrival, the DSL will share relevant information in advance and, where appropriate, speak directly to the receiving DSL. WHTC will likewise seek safeguarding information promptly when pupils join.

8. Children who may be at greater risk of harm

Any child can be abused or neglected. Some children face additional vulnerabilities, barriers to recognition/disclosure or circumstances that increase risk. These factors never reduce the requirement to respond to the individual child and should not be treated as a checklist.

8.1 Children with a social worker or previous statutory involvement

The DSL holds and uses information about current and previous social care involvement to inform decisions about safety, attendance, behaviour, academic support and pastoral planning. Relevant information is shared with staff who need it to support the child. The school works closely with social workers and the Virtual School Head where applicable.

8.2 Looked-after and previously looked-after children

The DSL works with the Designated Teacher and relevant local authority professionals so that care, placement and safeguarding information informs educational planning. The school is alert to placement instability, missing episodes, exploitation and other additional risks. Previously looked-after children are supported in recognition that prior adversity may continue to affect wellbeing and education.

8.3 SEND, health conditions and communication needs

Children with SEND, disabilities or medical conditions can face additional safeguarding challenges, including assumptions that indicators relate to their condition; communication barriers; disproportionate isolation, bullying or abuse; dependence on adults or intimate care; difficulty recognising or understanding abuse; cognitive difficulty distinguishing fact from fiction online or understanding consequences; and reduced access to trusted adults. Staff must use professional curiosity, make reasonable adjustments and ensure communication methods are accessible. Repeated failure to provide essential medication or relevant medical information may indicate neglect and must be considered through safeguarding procedures. Where reasonable force is considered, additional vulnerabilities and Equality Act duties are explicitly considered.

8.4 Children absent from education and children missing education

Repeated or prolonged absence can be a safeguarding warning sign. Attendance concerns are considered in the context of the child's wider safeguarding picture rather than solely as an attendance matter. WHTC follows its Attendance Policy and local procedures, seeks to understand barriers, shares concerns with the DSL and makes referrals where absence may indicate abuse, neglect, exploitation, mental ill-health, criminal activity, trafficking or other harm.

8.5 Alternative provision

Pupils in alternative provision can be particularly vulnerable. WHTC remains responsible for safeguarding pupils it places elsewhere. Before placement it undertakes due diligence, obtains written assurance that appropriate safeguarding checks have been completed, knows the exact site(s) the pupil will attend and ensures the provider will notify WHTC of staffing/arrangement changes that may alter risk. Placements are reviewed at least half-termly and immediately if safeguarding concerns arise.

8.6 Mental health, self-harm and suicidal ideation

Mental health problems can in some cases indicate that a child has suffered or is at risk of abuse, neglect or exploitation. Staff do not diagnose; they identify, listen and refer. A mental health concern that is also a safeguarding concern is acted on immediately through this policy. Where there is immediate risk to life or serious injury, emergency health/police support is sought.

8.7 Other circumstances requiring additional vigilance

- young carers and children affected by parental illness, substance misuse, imprisonment or offending;
- children experiencing homelessness or temporary/unstable accommodation;
- children in kinship care, private fostering arrangements or family court proceedings;
- children at risk of exploitation, trafficking, modern slavery, serious violence, forced marriage, honour-based abuse or radicalisation;
- children who are lesbian, gay or bisexual, or who are questioning their sexual orientation or gender, particularly where bullying, family rejection, exploitation or mental-health risk is present. Staff respond to safeguarding needs without making assumptions and in line with current statutory guidance and Equality Act duties;
- children subject to discrimination, racism, prejudice or social isolation; and
- children whose circumstances change suddenly, including elective home education requests where safeguarding concerns are present.

9. Child-on-child abuse, harassment and violence

WHTC recognises that children can abuse other children, inside and outside school and online. The school maintains an "it could happen here" approach even when there are no reports. There is zero tolerance of abuse: it is never dismissed as banter, "just having a laugh", part of growing up or "boys being boys".

Child-on-child abuse includes bullying (including cyberbullying and prejudice/discriminatory bullying); abuse in intimate relationships; physical abuse and weapon-related harm/threats; harmful sexual behaviour (HSB), sexual harassment and sexual violence; misogyny/misandry where linked to harmful behaviour; consensual and non-consensual making/sharing of nudes or semi-nudes including AI-generated/deepfake images; causing someone to engage in sexual activity without consent; upskirting; and initiation/hazing.

9.1 Prevention and reporting

- Staff actively challenge sexualised, discriminatory, violent and degrading behaviour and language rather than normalising it.
- Students are taught about consent, healthy relationships, online safety, harassment, sexual violence, harmful sexual behaviour and how to report concerns through RSHE/PD and the wider curriculum.
- Reporting routes are promoted, accessible and include trusted adults, the safeguarding team and confidential/anonymous mechanisms.
- Student voice, safeguarding data and hotspot analysis are used to identify locations, groups or times where children feel less safe and to adjust supervision/environmental controls.

9.2 Response to a report

1. Take the report seriously, protect the child from immediate harm and avoid repeated retelling.
2. Inform the DSL/DDSL immediately. The DSL leads the response and considers any need to preserve evidence, confiscate a device in line with guidance, contact police or Children's Social Care, and avoid viewing/forwarding illegal images.
3. Complete an immediate risk and needs assessment considering the child reporting harm, the child alleged to have caused harm, other children, locations/times, online risks, contact between pupils and any wider peer-group or contextual risk.
4. Record, investigate and respond proportionately. The safeguarding response and any behaviour/disciplinary response run alongside one another and neither should compromise police/social care enquiries.
5. Provide support to all affected children. Support for the child alleged to have caused harm does not minimise the impact on the child reporting harm and may include assessment of the child's own trauma, needs or exploitation.
6. Keep arrangements under review for as long as risk remains, including timetables, travel, lessons, social spaces, online contact, sanctions, attendance and educational access.

9.3 Sexual harassment, sexual violence and HSB

Reports of HSB, sexual harassment or sexual violence are treated as safeguarding matters. The DSL considers the wishes of the child reporting harm, the nature of the incident, ages/development, power imbalance, patterns, coercion, disability/SEND, whether a crime may have been committed, and risks to other children. A child's wish not to involve police is taken seriously and discussed sensitively, but it does not automatically prevent a referral where safeguarding or criminal thresholds require action.

Where a report is made to the police, the school works with police and Children's Social Care to avoid prejudicing investigations while continuing to safeguard and educate all children involved. The school does not wait for criminal proceedings to conclude before taking necessary safeguarding action.

9.4 Nudes and semi-nudes, including AI-generated imagery

Every incident involving the making or sharing of nudes/semi-nudes requires a safeguarding response. Staff must not view, copy, print, share, forward, save or store an image and must not ask a child to send or display it. The DSL must be informed immediately. Devices may be secured where necessary to preserve evidence. The DSL follows current UKCIS and KCSIE guidance and considers whether police/Children's Social Care referral is required. AI-altered or wholly AI-generated sexual images of children are treated within the same safeguarding framework.

10. Online safety, filtering and monitoring

Online safety is integral to safeguarding and applies to school devices, networks, remote education, online platforms, mobile technology and children's experiences beyond school where these affect welfare or school life. Risks include harmful or illegal content, unsafe contact, harmful conduct, exploitation/commerce, cybercrime, generative AI misuse and online facilitation of offline abuse.

10.1 Leadership and responsibilities

- The Trust Board ensures appropriate filtering and monitoring systems and receives assurance on their effectiveness.
- A named senior leader holds operational responsibility for filtering and monitoring. The DSL has lead safeguarding responsibility and works with IT support/provider to understand, review and escalate concerns.
- Staff know what filtering and monitoring systems do, the limitations of those systems, how to report concerns and why technical controls do not replace supervision and professional judgement.
- Online safety, cyber security and safeguarding are considered together, including access management and protection of personal information.

10.2 Filtering and monitoring review

WHTC reviews the effectiveness of filtering and monitoring at least once every academic year and whenever safeguarding risk, working practice, technology or technical configuration changes materially. The review is led by the responsible SLT member with support from the DSL and IT and involves the responsible governor. It checks that filtering and monitoring work appropriately on all internet-connected devices in all relevant locations, reviews monitoring/escalation arrangements, considers the school's risk profile and use of generative AI, and keeps a written record of checks, decisions and actions. The review has regard to the current DfE filtering and monitoring standard and DfE generative AI product safety standards.

- Roles and responsibilities for managing filtering and monitoring are explicitly assigned.
- Harmful and inappropriate content is blocked without unreasonably restricting teaching and learning.
- Monitoring strategies are proportionate to the school's safeguarding risks and age range.
- The approach is informed by the Prevent risk assessment and DfE filtering and monitoring standards.
- Online safety is reviewed at least annually through a risk assessment that reflects the specific risks faced by WHTC pupils.

10.3 Generative AI and emerging technologies

The school recognises that generative AI can create new safeguarding risks, including sexualised deepfakes, impersonation, harmful or personalised content, privacy breaches, grooming, misinformation and attempts to bypass filters. Before introducing generative-AI tools, WHTC assesses safeguarding, privacy and technical risks and considers whether filtering/monitoring can address real-time, dynamic, personalised or AI-generated content. Staff and pupils follow the school's acceptable-use/AI requirements and report safeguarding concerns through normal routes.

10.4 Mobile phones and personal devices

WHTC is a mobile phone-free environment throughout the school day. Any authorised exception must be based on an individual medical, SEND or other exceptional need and managed in accordance with the school's behaviour and acceptable-use arrangements. Safeguarding concerns involving a device are managed under this policy and current Searching, Screening and Confiscation and UKCIS guidance. Staff must never search, view or forward sexual imagery outside those procedures.

11. Preventing radicalisation and the Prevent duty

WHTC recognises radicalisation as a safeguarding issue and fulfils the Prevent duty as part of its wider safeguarding responsibilities. Staff are trained to identify and report concerns and understand that vulnerability to radicalisation can arise through online and offline influences and may overlap with other forms of exploitation or social isolation.

- The DSL is the safeguarding lead for Prevent referrals and maintains appropriate Prevent/Channel knowledge.
- The school maintains a Prevent risk assessment and uses it to inform curriculum, staff training, online filtering/monitoring and site/community arrangements.

- Child-related Prevent concerns are referred through Brent Family Front Door and/or the relevant Prevent route, with police involvement where immediate risk or criminality requires it.
- Where a child is considered vulnerable to being drawn into terrorism, the school cooperates with Channel and other agencies and supports agreed safeguarding plans.
- Prevent work is conducted lawfully, proportionately and without stereotyping pupils on the basis of religion, ethnicity or political views.

12. Specific safeguarding duties and harms

Staff do not need to memorise every definition in order to act. If anything causes concern about a child's safety or welfare, the staff member should report it. Appendix A provides concise definitions and possible indicators. The following statutory/specific duties require particular attention.

12.1 Female genital mutilation (FGM)

FGM is illegal and a form of child abuse. All concerns that a girl may be at risk of FGM are reported to the DSL immediately and managed through safeguarding procedures. In addition, where a teacher discovers in the course of their professional work that FGM appears to have been carried out on a girl under 18, the teacher has a personal statutory duty to report this to the police. The teacher should also inform the DSL unless there is a good reason not to do so. Staff must never conduct a physical examination to establish whether FGM has taken place.

12.2 Forced marriage and honour-based abuse

Forcing a person into marriage is a crime. Concerns about forced marriage or honour-based abuse are referred immediately to the DSL; the school seeks specialist advice and does not mediate with family members or alert them where doing so could increase risk. The DSL considers police, Children's Social Care and Forced Marriage Unit involvement.

12.3 Child sexual/criminal exploitation and county lines

Exploitation may involve coercion, deception, exchange, violence, threats, debt bondage, movement/trafficking or apparent consent. A child may be both victim and alleged offender. Missing episodes, unexplained money/items, older associates, drug activity, changes in relationships/attendance, injuries or weapon carrying may indicate risk. The school responds to the child's vulnerability as well as any behaviour/criminal concerns and shares information with relevant agencies.

12.4 Domestic abuse and Operation Encompass

Children who see, hear or experience the effects of domestic abuse are victims in their own right. WHTC responds to disclosures, police notifications and Operation Encompass information as safeguarding information, considers immediate safety and provides proportionate support. Information is shared only with staff who need it to support the child.

12.5 Modern slavery and trafficking

Concerns about trafficking, forced labour**,** exploitation or modern slavery are referred to the DSL and Children's Social Care/police as appropriate. The DSL considers whether a referral through the National Referral Mechanism is required and works with competent agencies rather than attempting to establish immigration or trafficking status independently.

12.6 Serious violence, weapons and criminal harm

The school is alert to indicators of serious violence including increased absence, changes in peer groups, decline in performance, signs of assault/injury, unexplained possessions, exploitation and weapon carrying. Immediate threats are managed as emergencies. The DSL coordinates risk assessment and referrals, including consideration of risks to other pupils and the wider community.

13. Concerns and allegations about adults

WHTC has procedures for every safeguarding concern about an adult working with children, no matter how small. This includes employees, agency/supply staff, trainee teachers, volunteers, contractors and visitors. Staff must not investigate the concern themselves.

13.1 Reporting route

Concern is about…	Report immediately to…
Any member of staff, supply/agency worker, trainee teacher, volunteer, contractor or visitor	Headteacher and DSL
Headteacher	Chair of Governors — chair@whtc.co.uk
A situation where reporting to the Headteacher/Chair of Governors creates a conflict of interest	Chair of Trustees chair@wmat.co.uk and/or Brent LADO directly
Chair of Trustees / a conflict preventing normal Trust reporting	Brent LADO directly and an appropriate senior Trust officer/trustee

13.2 Concerns that may meet the harm threshold

The harm threshold includes circumstances where a person has behaved in a way that has harmed a child or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child/children in a way indicating they may pose a risk of harm; or behaved, or may have behaved, in a way indicating they may not be suitable to work with children. The Headteacher is the case manager and retains overall responsibility. At WHTC the DSL may lead the operational safeguarding response and liaise with the LADO and other agencies, reporting to the Headteacher throughout. The Headteacher/DSL will contact the LADO for advice/referral where required.

The case manager does not conduct an internal fact-finding investigation before taking LADO advice where the harm threshold may be met. Immediate risk management can be taken to safeguard children. Suspension is not an automatic response and is considered only after risk assessment and alternatives, with LADO/HR/police/social care advice as appropriate.

13.3 Low-level concerns

A low-level concern is any concern, however small and even if no more than causing a sense of unease or a “nagging doubt”, that an adult may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside work, but does not meet the harm threshold. Low-level does not mean insignificant.

- Low-level concerns are reported promptly to the Headteacher or DSL and recorded securely. Where a concern is initially reported to the DSL, the DSL informs the Headteacher.
- The Headteacher retains overall responsibility for deciding whether the concern is low-level, a conduct matter or potentially meets the harm threshold and requires LADO involvement. The DSL may gather safeguarding information and coordinate actions under the Headteacher’s oversight.
- Patterns and repeated concerns are reviewed so that seemingly minor events are not considered in isolation.
- Where a concern relates to the Headteacher, the Chair of Governors manages it.

13.4 Supply staff, contractors and trainee teachers

The school will not simply cease using a supply teacher, trainee teacher or contractor as an alternative to addressing a safeguarding concern. WHTC works with the employing agency/provider and LADO, ensuring allegations are investigated appropriately and the agency is kept informed as permitted. The school takes the lead in ensuring children are safeguarded on site.

13.5 Whistleblowing and referrals to professional bodies

Staff should use WMAT whistleblowing procedures if they believe safeguarding practice is unsafe, concerns are being suppressed or genuine concerns are not being addressed. The NSPCC Whistleblowing Advice Line is an external route. Where legal criteria are met, the Trust will make a DBS referral and, for teachers, consider referral to the Teaching Regulation Agency. Resignation or settlement does not remove these duties.

14. Safer recruitment and ongoing suitability

WHTC follows KCSIE Part Three and the WMAT Safer Recruitment Policy to deter, reject or identify people who may be unsuitable to work with children. Recruitment and vetting requirements are applied to employees, agency/supply staff, volunteers, contractors, governors/trustees and other adults as relevant to their role and regulated-activity status.

- At least one person involved in recruitment has appropriate safer recruitment training, and recruitment information communicates the Trust's safeguarding commitment.
- Applications are scrutinised, employment gaps/inconsistencies explored, references obtained and verified, identity/qualifications/right-to-work checked and appropriate DBS/barred-list/prohibition or other statutory checks completed before work starts, subject only to lawful risk-managed exceptions.
- Shortlisted candidates are informed that online searches may be carried out as part of due diligence, in line with KCSIE.
- The single central record is maintained accurately and checked through governance/leadership assurance.
- The school applies current statutory regulated-activity definitions and DBS requirements. The former supervision exemption no longer applies: volunteers who teach, train, instruct or supervise children are in regulated activity where the statutory frequency or overnight criteria are met.
- Appropriate checks/assurances are obtained for agency staff, contractors and alternative provision personnel before access to children.
- Staff are required to disclose relevant changes in circumstances in accordance with the Staff Code of Conduct, and ongoing suitability is managed through safeguarding, conduct and HR processes.
- Where dismissal/removal from regulated activity meets the legal referral criteria, the Trust refers to the DBS even if the person resigns first.

15. Reasonable force and restrictive intervention

There are limited circumstances where reasonable force may be necessary to safeguard a child or others. WHTC does not operate a "no contact" policy. Any force must be lawful, necessary, proportionate, use no more force than is necessary for the least amount of time and be guided by the circumstances and the child's needs.

- Staff use prevention, de-escalation and positive/proactive support wherever practicable.
- Particular care is taken where children have SEND, medical conditions, trauma histories or mental health needs, including reasonable adjustments and the Public Sector Equality Duty.
- Incidents are recorded and reviewed in accordance with the Use of Reasonable Force/Restrictive Intervention Policy, and parents/carers are informed as required.
- Any concern that force was excessive, punitive or unsafe is treated as a safeguarding concern and referred through this policy.
- Individual support/risk plans are used where foreseeable behaviour creates a repeated risk, with the aim of reducing restrictive intervention.

16. Premises, external providers and alternative provision

16.1 School premises and safeguarding

Safeguarding is considered in site supervision, access control, toilets/changing facilities, CCTV, duty arrangements, visitors, contractors, trips and use of school premises. The school complies with relevant premises regulations and seeks arrangements that protect the safety, privacy, comfort and dignity of all children.

WHTC manages toilets, changing rooms and showers in line with KCSIE 2026 and the School Premises (England) Regulations 2012. Pupils must not use toilets or changing facilities designated for the opposite biological sex. Pupils aged 11 or over at the start of the school year must not undress in front of a pupil of the opposite biological sex. Where an alternative is needed, the school will consider an individual, fully enclosed facility or separate access time, while protecting every child's safety, comfort, privacy and dignity. Decisions are recorded, appropriately communicated and regularly reviewed.

16.2 Lettings and external activities

Where the school/Trust directly supervises an activity, WHTC safeguarding arrangements apply. Where an external body provides an activity separately on school premises, the Trust obtains assurance that the provider has appropriate safeguarding and child protection policies/procedures and can liaise effectively with WHTC. Safeguarding requirements form a condition of hire/transfer-of-control agreements and serious breach can lead to termination. Allegations relating to an external provider using the site are managed with the LADO as appropriate.

16.3 Alternative provision and off-site education

The detailed safeguarding expectations in section 8.5 apply. In addition, WHTC always knows where a pupil is based during school hours, including provider addresses, subcontracted provision and satellite sites. Quality assurance includes attendance, safety, staff changes, curriculum/needs and pupil voice. The placement is reviewed at least half-termly and immediately if concerns arise.

16.4 Educational visits and overnight accommodation

Educational visits are risk assessed under the Educational Visits Policy. Children must not share overnight accommodation with a child of the opposite biological sex. If a child does not wish to share with a child of the same biological sex, the school will seek suitable separate arrangements where possible, while protecting every child's safety, comfort, privacy and dignity. Sleeping/changing arrangements and adjustments must comply with current statutory requirements. Necessary, proportionate safeguarding information is shared with visit leaders on a need-to-know basis.

16.5 Safeguarding in sport and physical activity

School-organised sport and physical activity are subject to the same safeguarding standards as other school activity. WHTC considers safer recruitment and checks for coaches/volunteers, supervision, one-to-one coaching, physical contact, changing facilities, transport, photography/filming, medical needs and away fixtures. Where safety requires a sport to be separated by biological sex, there will be no exceptions. Other requests relating to participation are considered individually in accordance with current statutory guidance, the Equality Act and the best interests of all children. External clubs or coaches using the site are subject to the assurance arrangements in section 16.2.

The school recognises that changing rooms can make pupils feel vulnerable and may present increased risks of bullying, harmful sexual behaviour or other safeguarding concerns. Appropriate supervision will be determined according to pupils' age, developmental needs and identified risks, while respecting their privacy and dignity. Staff should normally supervise from nearby rather than remain inside; where entry is necessary, pupils should be alerted in advance and given time to cover themselves. Staff must not change or shower alongside pupils.

Suitable, sensitive arrangements will be made for pupils who require additional support, and any concerns observed or reported must be recorded and referred promptly in accordance with the school's safeguarding procedures.

17. Training, induction and teaching safeguarding

17.1 Staff induction and training

- All staff, including those who do not work directly with children, read KCSIE Part One in full. School leaders and staff who work directly with children also read KCSIE Annex A. Internal quick-reference materials may supplement, but do not replace, these requirements.
- At induction, staff are given/introduced to this child protection policy, behaviour policy, staff code of conduct, safeguarding response to absence from education, identity/role of DSL/DDSLs and relevant online safety/filtering and monitoring arrangements.
- All staff receive safeguarding and child protection training, including online safety, at induction and training is regularly updated. Safeguarding updates are provided as required and at least annually.
- Training reflects local safeguarding partner advice and WHTC's current safeguarding themes, including child-on-child abuse, sexual violence/harassment, exploitation, attendance, online harms, Prevent and information sharing.

- The DSL and DDSLs undertake role training at least every two years, Prevent awareness training and knowledge/skills refresh at least annually.

17.2 Trustees and governors

Trustees/governors receive safeguarding and child protection training at induction and this is regularly updated so that they can provide strategic challenge and assurance. Those involved in recruitment receive appropriate safer recruitment training.

17.3 Teaching children how to keep safe

Safeguarding is taught through RSHE, Personal Development, Citizenship, online safety, assemblies, tutor time and the wider curriculum. Teaching is age-appropriate and inclusive and covers healthy relationships, consent, abuse, harassment, online safety, sharing imagery, exploitation, radicalisation, mental health, discrimination and how to seek help. Teaching complements rather than replaces protective school systems.

18. Governance, quality assurance and review

The Trust Board and Headteacher assure themselves that safeguarding arrangements are effective and form a robust whole-school approach. The DSL provides regular safeguarding reports and themes while protecting individual confidentiality.

- The child protection policy is reviewed at least annually and whenever legislation, KCSIE, local procedures or learning from incidents/reviews makes an earlier update necessary.
- Implementation is reviewed through safeguarding audits, case sampling, CPOMS quality assurance, recruitment/SCR checks, training evaluation, attendance/vulnerable pupil review, pupil voice, site/duty review, filtering and monitoring review and governance visits/challenge.
- The school learns from complaints, low-level concerns, allegations, child safeguarding practice reviews, local/national reviews and internal incidents, and records actions to address weaknesses without delay.
- The policy is publicly available and parents/carers are informed that safeguarding concerns may be referred to Children's Social Care and other agencies.
- Safeguarding records and data are used to identify themes and disproportionality while maintaining confidentiality and avoiding decisions based on stereotype.

19. Related policies and statutory guidance

19.1 Related WHTC / WMAT policies

- Behaviour Policy (including bullying, cyberbullying, prejudice-based and discriminatory bullying)
- Staff Code of Conduct / safer working practice (including professional boundaries and technology use)
- Low-Level Concerns and Allegations / HR procedures, where maintained separately
- Whistleblowing Policy
- Safer Recruitment Policy and Single Central Record procedures
- Attendance Policy and Children Missing Education procedures
- Online Safety / Acceptable Use / Information Security policies
- Use of Reasonable Force / Restrictive Intervention Policy
- SEND Policy and Supporting Pupils with Medical Conditions Policy
- Alternative Provision / off-site quality assurance arrangements
- Educational Visits Policy
- Data Protection / Records Management / Privacy policies
- RSHE / Personal Development policies
- Equality Policy
- Complaints Policy and Health & Safety Policy

19.2 Principal statutory guidance and legislation

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Prevent duty guidance
- Information sharing advice for safeguarding practitioners
- Sharing nudes and semi-nudes: advice for education settings
- Searching, Screening and Confiscation at School
- Children missing education: statutory guidance
- Female genital mutilation: multi-agency statutory guidance
- Restrictive interventions, including use of reasonable force, in schools

Relevant legislation includes the Children Acts 1989 and 2004; Education Act 2002; Safeguarding Vulnerable Groups Act 2006; Counter-Terrorism and Security Act 2015; Female Genital Mutilation Act 2003; Serious Crime Act 2015; Equality Act 2010; Data Protection Act 2018; UK GDPR; Data (Use and Access) Act 2025; and other legislation referenced in KCSIE.

APPENDIX A - Definitions and possible indicators

Back to contents

How to use this appendix
These definitions support recognition; they are not diagnostic checklists. Staff do not need certainty or a labelled category before reporting. A change, pattern, disclosure or professional concern should be shared with the DSL/DDSL.

Abuse: A form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can be physical or non-physical, can include seeing or hearing the ill-treatment of others, and may occur within the family, an institution, the community or online. Children may be abused by adults or by other children.

Physical abuse: May include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Possible indicators include injuries inconsistent with explanations, repeated or unusual bruising or burns, fear of going home or seeking medical help, or unexplained patterns of injury.

Emotional abuse: Persistent emotional maltreatment of a child that causes severe and adverse effects on emotional development. It may involve humiliating, rejecting, silencing or frightening a child; making them feel worthless or inadequate; imposing inappropriate expectations; exploiting or corrupting them; or serious bullying, including online bullying. Possible indicators include extreme self-criticism, fearfulness, withdrawal, self-harm, developmental or emotional change, or marked changes in behaviour.

Sexual abuse: Forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening. It includes contact and non-contact activities, grooming, online abuse, sexual imagery and exploitation. Sexual abuse may be perpetrated by adults or by other children of any sex.

Neglect: Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. It may include inadequate food, clothing, shelter or supervision; failure to protect a child from harm; failure to secure appropriate healthcare; or unresponsiveness to emotional needs. Possible indicators include hunger, poor hygiene, untreated illness or injury, inappropriate caring responsibilities or persistent unexplained absence.

Child-on-child abuse: Abuse of one child by another child or group of children. It can occur inside or outside school and online. It includes bullying, including cyberbullying and prejudice-based bullying; abuse in intimate relationships; physical abuse; sexual harassment and sexual violence; harmful sexual behaviour; consensual and non-consensual sharing of nudes and semi-nudes; upskirting; initiation or hazing; and weapon-related harm or threats. A lack of reports does not mean that abuse is not occurring.

Harmful sexual behaviour (HSB): Sexual behaviour expressed by children that is developmentally inappropriate, may be harmful to the child or others, or may be abusive. Sexual behaviour exists on a continuum and should be considered in the context of age, development, consent, power imbalance, coercion, persistence, intent and impact.

Sexual harassment: Unwanted conduct of a sexual nature that can occur online or face-to-face. It may include sexual comments or jokes, sexualised name-calling, unwanted sexual attention, displaying sexual material, sexualised online behaviour or other conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual violence: Sexual offences including rape, assault by penetration and sexual assault. Any report of sexual violence is a safeguarding matter and requires an appropriate risk and needs assessment. Police and Children's Social Care involvement may be required.

Making or sharing nudes and semi-nudes: The creation, sending, sharing or posting of nude or semi-nude visual content by, or depicting, a person under 18. This includes photographs, videos, livestreams, digitally altered images and AI-generated or deepfake imagery. Apparent consent between children does not remove the safeguarding response or potential legal implications.

Child sexual exploitation (CSE): A form of child sexual abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This may be in exchange for something the child needs or wants, or for the financial advantage, increased status or gratification of the perpetrator. A child may appear to consent to sexual activity and can still be sexually exploited.

Child criminal exploitation (CCE): Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, for the financial advantage or status of the perpetrator, or through violence or threats of violence. CCE can include county lines, drug movement, theft, vehicle crime, forced criminality, serious violence and weapon carrying. A child cannot consent to being exploited, abused or trafficked and should have their vulnerability recognised even where they have committed offences.

County lines: A form of child criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other "deal lines" to facilitate illegal drug supply. It may take place locally or across wider geographical areas; no particular distance of travel is required. Children may be exploited to move, store or sell drugs or money and may be controlled through coercion, intimidation, violence, weapons or manufactured debt.

Extra-familial harm: Harm that occurs outside a child's immediate family environment, including within peer groups, intimate relationships, neighbourhoods, schools, public spaces and online. It may include sexual or criminal exploitation, serious violence, teenage relationship abuse, county lines and radicalisation. Safeguarding assessments should consider the contexts and relationships beyond the home that may be creating or increasing risk.

Domestic abuse: Abusive behaviour between people aged 16 or over who are personally connected. It may comprise a single incident or a course of conduct and can include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological, emotional or other abuse. Children who see, hear or experience the effects of domestic abuse are victims in their own right.

Female genital mutilation (FGM): Procedures involving the partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons. FGM is illegal and is a form of child abuse. Teachers have a personal statutory duty to report to the police where, in the course of their professional work, they discover that FGM appears to have been carried out on a girl under 18. Staff must not physically examine a child to establish whether FGM has taken place.

Honour-based abuse: Abuse committed to protect or defend the perceived "honour" of an individual, family or community. It can encompass a range of offences and harmful practices, including coercive control, threats, violence, forced marriage and FGM. Concerns should be treated as safeguarding matters and staff should not mediate with, or alert, family members where this could increase risk.

Forced marriage: A marriage in which one or both people do not, or cannot, consent and where pressure, coercion or abuse is used. Forced marriage is a criminal offence. Pressure may be physical, psychological, financial, sexual or emotional. Staff should refer concerns immediately and should not attempt family mediation.

Modern slavery and trafficking: Exploitation through slavery, servitude, forced or compulsory labour, trafficking or related practices. Children cannot consent to being trafficked. Possible indicators include being controlled by others, unexplained movement, fearfulness, exploitation, unexplained work or activity, debt, isolation or repeated missing episodes.

Radicalisation: The process of a person legitimising support for, or use of, terrorist violence. Children may be susceptible to radicalisation through online or offline influences. Concerns should be approached as safeguarding concerns and assessed according to vulnerability and risk rather than assumptions based on identity, religion, ethnicity or background.

Extremism: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Extremist views do not automatically mean that a child is at risk of terrorism; staff should consider the individual circumstances and report safeguarding concerns through normal procedures.

Serious violence: Serious physical violence, weapon-related harm or involvement in violent criminal activity. Possible indicators include increased or unexplained absence, exploitation, injuries, changes in peer groups, possession of weapons, unexplained money or possessions, declining performance and deterioration in wellbeing or behaviour.

Mental health as a safeguarding indicator: Mental health difficulties can, in some circumstances, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. They may also be a consequence of trauma or other adverse experiences. Staff should identify, listen and refer concerns; diagnosis should be undertaken only by appropriately qualified professionals.

Children absent from education / children missing education: Repeated, prolonged or unexplained absence can be an important safeguarding warning sign. It may be associated with abuse or neglect, sexual or criminal exploitation, county lines, mental health difficulties, substance misuse, FGM, honour-based abuse, forced marriage, trafficking or other harm. Attendance concerns should therefore be considered within the child's wider safeguarding circumstances and not solely as an attendance matter.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a child from a parent or another person with legal responsibility for them. It may involve family members, people known to the child or strangers. Other community safety concerns may include suspicious adults approaching children or loitering around schools and other places children gather. Such incidents should be reported and considered within the wider safeguarding context.

Children and the court system: Children may experience significant stress and vulnerability through involvement in the criminal justice system as victims or witnesses, or through family court proceedings following parental separation. Staff should be alert to the potential emotional, educational and safeguarding impact and ensure that appropriate support is available.

Children with family members in prison: Children affected by the imprisonment of a parent or close family member may experience poverty, stigma, isolation, disrupted family relationships, emotional distress or increased caring responsibilities. Staff should consider whether these circumstances create additional welfare or safeguarding needs and provide proportionate support.

Cybercrime: Criminal activity involving computers, networks or digital systems. Cyber-dependent crime may include unauthorised access or hacking, malware and denial-of-service attacks. Children with advanced digital skills may require safeguarding and diversionary support where their online activity places them at risk of exploitation, criminal involvement or offending.

Homelessness and temporary accommodation: Housing instability can increase vulnerability through poverty, overcrowding, disrupted education, reduced access to services, domestic abuse, exploitation or unsafe living arrangements. Homelessness or temporary accommodation should therefore be considered as part of the child's wider safeguarding circumstances.

Private fostering: A private arrangement in which a child under 16, or under 18 if disabled, is cared for and accommodated for 28 days or more by someone who is not their parent, a person with parental responsibility or a close relative. Where the school becomes aware of a private fostering arrangement, the local authority must be notified so that the arrangement can be assessed and the child safeguarded.

APPENDIX B - Staff quick-response procedures

Back to contents

B1. Concern about a child — quick route

1. Immediate danger? Call 999 / emergency services. Make the child safe where possible.
2. Tell the DSL or a DDSL immediately. If urgent, speak to them before logging.
3. Record on CPOMS promptly: what you saw/heard, child's words, context, date/time, action, who was informed.
4. If DSL/DDSL cannot be reached and action cannot wait, speak to a senior leader and/or contact Brent Family Front Door directly. Anyone can refer.
5. Follow up. If the child's situation does not improve or you remain worried, challenge and escalate.

B2. If a child tells you about abuse

Do	Do not
Listen and take the child seriously.	Do not promise confidentiality or secrecy.
Use calm, open prompts only if needed to understand immediate safety.	Do not investigate, interrogate or ask leading questions.
Use the child's own language and acknowledge what they are saying.	Do not make the child repeat the account unnecessarily.
Explain that you need to share with people who can help keep them safe.	Do not contact an alleged perpetrator or parent without DSL advice.
Tell the DSL/DDSL immediately and record accurately.	Do not delay reporting while trying to establish proof.

B3. Concern about an adult

- Do not discuss widely or investigate.
- Report any concern about staff/supply/trainee/volunteer/contractor/visitor to the Headteacher and DSL immediately.
- If the concern is about the Headteacher, report to the Chair of Governors at chair@whtc.co.uk.
- Where there is a conflict of interest, report directly to the LADO.
- Low-level concerns are still reported and recorded; patterns matter.

B4. FGM teacher mandatory reporting

FGM appears to have been carried out on a girl under 18
The teacher must personally report to the police. Also inform the DSL unless there is a good reason not to. This personal duty applies to discovered cases; suspected/at-risk cases follow normal safeguarding referral routes. Staff must not physically examine a child to establish FGM.

B5. Sexual imagery on a device

- Do not view, copy, print, share, forward, save or store the image.
- Secure the situation/device if needed and inform the DSL immediately.
- Do not ask a child to send the image to you or show it to others.
- The DSL follows KCSIE/UKCIS guidance and considers police/social care referral, victim support and risk to others.

APPENDIX C - Child-on-child abuse response framework

Back to contents

This framework supports consistent DSL decision-making. It is not a substitute for professional judgement, KCSIE Part Five, police or Children's Social Care advice.

C1. Immediate safeguarding questions

- Is anyone in immediate danger or in need of medical attention?
- Is there an allegation of rape, assault by penetration, sexual assault, serious violence, weapon use or another crime requiring police consideration?
- Does the child need protection from contact with another child today — in lessons, social time, travel, online or outside school?
- Is there evidence to preserve, including devices/CCTV/messages, and how can this be done without staff viewing/forwarding illegal imagery?
- Are siblings, friendship groups or other pupils at risk?
- Do parents/carers need to be informed now, or could this increase risk/prejudice an investigation?

C2. Risk and needs assessment

Area	Questions to consider
Child reporting harm	Wishes/feelings; immediate safety; trauma/health; SEND/communication; fear of retaliation; attendance/education; online exposure; trusted adults; family context.
Child alleged to have caused harm	Age/development; understanding; intent; coercion/power; pattern; own trauma/abuse/exploitation; SEND; risk to others; support and boundaries.
Incident	Nature/severity; consent; power imbalance; repetition; weapon; sexual element; location; online/offline; group involvement; criminal threshold; evidence.
Wider context	Peer-group norms; misogyny/misandry/discrimination; hotspots; gang/exploitation indicators; sibling risks; social media spread; supervision or environmental changes needed.
Protective plan	Separation/contact; timetable; lessons; breaks/lunch; toilets/changing; arrival/departure; travel; online contact; staff visibility; parent liaison; external agencies; review date.

C3. Possible response pathways

- Manage internally with safeguarding oversight where the behaviour is concerning but does not require statutory referral, alongside education/support and proportionate behaviour response.
- Family Help/early help where additional multi-agency support is indicated.
- Children's Social Care referral where the child is in need or there is reasonable cause to suspect significant harm.
- Police report where a crime may have been committed; sexual violence and serious violence require particularly careful police/social care consideration.
- Specialist services for HSB, sexual violence, exploitation, mental health or other identified needs.

C4. Ongoing review

The DSL records decisions and rationale, assigns actions and review dates, monitors attendance/education and checks directly with affected children that protective arrangements are working. Risk assessments are dynamic and updated after new disclosures, online developments, police/social care advice, sanctions, timetable changes or return from suspension/absence.

APPENDIX D - Local referral routes and external contacts

Back to contents

Service	Contact / purpose
WHTC safeguarding inbox	safeguarding@whtc.co.uk — internal safeguarding concerns and contact with DSL team.
DSL	Christopher Kenny — ckenny@whtc.co.uk
Brent Family Front Door / Children's Social Care	020 8937 4300 option 1; family.frontdoor@brent.gov.uk — professional referrals, child in need / child protection concerns, advice.
Brent Emergency Duty Team	020 8863 5250 — outside office hours.
Brent LADO	Access/referral via Brent Family Front Door, 020 8937 4300 option 1; family.frontdoor@brent.gov.uk — allegations/concerns about adults working with children.
Brent Prevent	Child safeguarding concerns via Family Front Door. Prevent team: prevent@brent.gov.uk; Channel/Prevent referral routes should follow current Brent guidance.
Police emergency	999 — immediate danger, serious crime in progress or urgent protection.
Police non-emergency	101 — non-emergency police matters where police advice/reporting is appropriate.
NSPCC Whistleblowing Advice Line	0800 028 0285 / help@nspcc.org.uk — external advice where staff cannot raise safeguarding failures internally or believe concerns are not being addressed.
NSPCC helpline	0808 800 5000 — safeguarding advice for adults/professionals.
Childline	0800 1111 — confidential support for children and young people.

Local details change

The DSL should verify this appendix at least annually and whenever Brent changes referral routes. Current online referral forms/threshold guidance should be used rather than relying solely on telephone/email details in a static policy.

APPENDIX E - Role of the DSL and Deputy DSLs

Back to contents

This appendix summarises the KCSIE 2026 DSL role. It should be read alongside KCSIE Annex B; it does not reduce or replace those statutory expectations.

E1. Availability and cover

- The DSL should be available during school hours for staff to discuss safeguarding concerns. WHTC uses trained DDSLs and a monitored safeguarding inbox to provide robust cover.
- Out-of-hours/holiday arrangements are appropriate to school activities and known risks. Any deputy carrying out DSL functions is trained to the same standard.

E2. Manage referrals

- Refer cases of suspected abuse/neglect/exploitation to local authority Children's Social Care and support staff who make referrals.
- Refer to the police where a crime may have been committed and liaise on ongoing safeguarding arrangements.
- Refer Prevent concerns/Channel as appropriate.
- Refer to DBS where a person is dismissed/removed from regulated activity and legal referral criteria are met, and consider Teaching Regulation Agency referrals as required.

E3. Work with others

- Act as a source of safeguarding support/advice for staff and work closely with Headteacher, senior leaders, SEND, attendance, behaviour, pastoral/welfare, Designated Teacher and curriculum leaders.
- Liaise with Children's Social Care, police, health, local safeguarding partners and other agencies; attend/contribute to child protection and other multi-agency meetings.
- Promote the educational outcomes of children with current/previous social worker involvement by sharing relevant information with staff who need it.
- Understand local thresholds, Family Help, section 17, section 47 and escalation routes.

E4. Information sharing and child protection files

- Keep child protection files up to date, confidential and secure, with clear factual records that distinguish observation, professional opinion and historic information.
- Ensure records include a clear summary, follow-up/resolution, action, decisions and outcomes.
- Transfer files securely within KCSIE timescales, obtain receipt and provide a structured summary; share risk/support information in advance where appropriate.

E5. Raise awareness and maintain knowledge

- Ensure staff can access and understand the child protection policy and know the DSL/DDSL identities and procedures.
- Review the policy at least annually and procedures/implementation regularly; ensure it is publicly available.
- Link with safeguarding partners and keep local procedures/training current.
- Complete DSL training at least every two years, Prevent awareness training and knowledge/skills refresh at least annually.
- Maintain explicit safeguarding oversight of online safety and understand filtering and monitoring arrangements, working with the responsible SLT/IT functions.
- Understand children's views, barriers to disclosure and the lasting impact of adversity/trauma, including for SEND and children with social care involvement.

APPENDIX F - KCSIE 2026 Quick Reference Index

Back to contents

This index is designed as a practical reference for staff, leaders and governors. It signposts where key safeguarding topics are addressed within **Keeping Children Safe in Education 2026**, including the relevant Part, Annex, paragraph and page references. It is intended to support quick navigation of the statutory guidance and does not replace the requirement to read and understand KCSIE itself.

Topic	KCSIE 2026 Reference	Paragraph(s) / Page(s)
Safeguarding information all staff must know	*Part One*	**Paragraphs 1-82, Pages 8-28**
Safeguarding systems, policies and DSL information staff must know	*Part One – What school and college staff need to know*	**Paragraphs 11-17, Pages 9-11 This includes the Child Protection Policy, Behaviour Policy, Staff Code of Conduct, response to absence and identity/role of the DSL.**
Safeguarding and child protection training for all staff	*Part One*	**Paragraph 12, Page 10; also Part Two, Paragraphs 153-157, Pages 42-43**
Family help / support before statutory intervention	*Part One*	**Paragraphs 13, 18 and 60; community-based Early Help at Paragraph 64; statutory support at Paragraphs 65-69; Pages 10-12 and 21-23**
What staff should look out for: abuse, neglect, exploitation and vulnerability	*Part One – What school and college staff should look out for*	Paragraphs 18-56, Pages 11-20
What staff should do if worried about a child	*Part One – What school and college staff should do if they have concerns about a child*	**Paragraphs 57-76, Pages 21-24; flowcharts at Pages 27-28**
DSL unavailable / safeguarding action must not be delayed	*Part One*	Paragraph 61, Page 21; Annex B, Availability, Pages 183-184. KCSIE makes clear that DSL unavailability should not delay appropriate action.
Section 17: Child in need	*Part One*	**Paragraph 68, Page 23**
Section 47: Suffering or likely to suffer significant harm	*Part One*	Paragraph 69, Page 23; immediate referrals also addressed at Paragraph 65, Page 22
Concerns/allegations about another member of staff	*Part One*	**Paragraphs 77-79, Page 25; detailed procedure in Part Four**
Whistleblowing / unsafe safeguarding practice	*Part One*	**Paragraphs 80-82, Pages 25-26**
Governance and whole-school safeguarding	*Part Two – The management of safeguarding*	Begins Paragraph 83, Page 29
Safeguarding policies, reporting systems and child protection policy requirements	*Part Two – Safeguarding policies and procedures*	**Paragraphs 119-124, Pages 35-37. Includes requirements for clear reporting systems and an effective child protection policy.**