



Elm Court School
Child Protection & Safeguarding Policy
2025-26

Policy Consultation & Review

This policy is available on our school website and can be requested from the school office. We also inform parents and carers about this policy when their children join our school.

We recognise our staff's expertise by undertaking robust safeguarding training and managing safeguarding concerns daily. Therefore, we invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction, alongside our Staff Code of Conduct, Behaviour Policy and the Safeguarding response to those pupils who are missing from education. In addition, all staff are provided with Part One of the statutory guidance Keeping Children Safe in Education, DfE (2025).



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1. PURPOSE & AIMS

The purpose of Elm Court School safeguarding policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. This means we will always work to:

- Provide help and support to meet the needs of children as soon as problems emerge
- Protect children and young people from maltreatment, whether that is within or outside the home, including online
- Prevent impairment of children's and young people's mental and physical health or development
- Ensure that children and young people grow up in the circumstances consistent with providing safe and effective care
- Undertake that role to enable children and young people to have the best outcomes.

This policy will give clear direction to all staff, including supply staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our school.

Our school fully recognises its contribution to protecting children from harm and supporting and promoting good care of all registered pupils at our school. The elements of our policy are prevention, protection and support.

We recognise that our safeguarding responsibilities are linked to ensuring that appropriate safeguarding responses are in place for children absent from school or who go missing from education, particularly on repeat occasions. The Attendance Lead will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent pupils and those who go missing to identify the risk of abuse, neglect and exploitation, including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

This policy applies to all pupils, staff, parents, governors, volunteers and visitors.

2. OUR ETHOS

The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school are able to speak freely to any member of staff at our school if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

Everyone who meets children and their families has a role to play in safeguarding children. We recognise that staff at our school play a vital role as they can identify early concerns and help children prevent problems. **Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child. We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.



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It should be remembered that, due to their learning disabilities and/or language barriers, children may not know how to tell someone that they are being abused, exploited, or neglected, or they may not recognise their experiences as being harmful. They may not feel ready or be able to articulate abuse. It's therefore essential that staff build trusted relationship with children to facilitate communication and any changes in a child should be reported on the safeguarding platform. Staff must have curiosity and speak to the DSL about any concerns for a child.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, respond to a disclosure from a child and record and report this information. We will not make promises to any child to keep secrets. Every child will be informed that any safeguarding concerns will be disclosed to the DSL.

It is important to listen carefully to the child, reflecting back, using the child's language (or preferred method of communication), being non-judgemental, being clear about boundaries and recording facts as the child presents them.

We will work in partnership to establish effective working relationships with parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children](#) (2025) and the [Lambeth Safeguarding Children Partnership](#).

As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a coordinated offer of early help when children's additional needs are identified. These may include if a child:

- Is disabled or has certain health conditions
- Specific additional needs including Cognitive Understanding.
- Mental Health Need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care including persistent absences
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family environment with drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Has returned home to their family from care
- Is showing early signs of abuse and neglect
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Has English as an additional language (EAL).
- Are asylum seekers.
- Are looked after or previously looked after.



3. ROLES AND RESPONSIBILITIES

Local Authority Contacts
<p>Lambeth Integrated Referral Hub: 020 7926 3100</p> <p>Out of hours: 0207 926 1000</p> <p>Local Authority Designated Officer (LADO): Andrew Zachariades</p> <p>Telephone: 0207 926 4579 / 0772 082 8700 Email: lado@lambeth.gcsx.gov.uk</p> <p>Senior Safeguarding Manager (Early Years, Primary schools, secondary schools and colleges): Deborah Carter</p> <p>Telephone: 07596955299 Email: dcarter@lambeth.gov.uk</p>
<p>Education Prevent Officer: Lydia Nixon</p> <p>Telephone: 0207 926 3668 Email: lnixon@lambeth.gov.uk</p>
<p>Head of Inclusion, Education and Learning: Stuart Boffin</p> <p>Telephone: 0207 926 0296 Email: sboffin@lambeth.gov.uk</p>
<p>CSE Co-ordinator Children's Services: Claire McDonald</p> <p>Telephone: 0207 926 0296 Email: CMcDonald@lambeth.gov.uk</p>

Role in School	Name	Contact details
Designated Safeguarding Lead (DSL)	Nilgun Salih	salih.n@elmcourt.lambeth.sch.uk
Mental Health Lead	Nilgun Salih	salih.n@elmcourt.lambeth.sch.uk
Deputy DSLs	Alejandro Alonso Joanna Tarrant Shaun Dodds Yusif Assim	alonso.a@elmcourt.lambeth.sch.uk tarrant.j@elmcourt.lambeth.sch.uk dodds.sl@elmcourt.lambeth.sch.uk assim.y@elmcourt.lambeth.sch.uk
Headteacher	Joanna Tarrant	tarrant.j@elmcourt.lambeth.sch.uk



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Named Safeguarding Governor	Michael Jenner	michaelcjenner@outlook.com
Chair of Governors	Michael Jenner	michael_c_jenner@outlook.com
Designated Teacher for Children Looked After	Alejandro Alonso	alonso.a@elmcourt.lambeth.sch.uk

3.1 The Governing Board

The Governing Board of The Elm Court Livity Federation is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our governing board takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named governor who champions safeguarding within the school.

The Governing Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with local authority guidance and the requirements of the Lambeth Safeguarding Children Partnership policies and procedures
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2025)
- A senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description
- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the school's safeguarding response for those pupils who go missing from education
- All staff undertake appropriate child protection training that is updated annually, this includes online safety training
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance
- Safer recruitment practices are followed by the requirements of [Keeping Children Safe in Education](#) DfE (2025).

The Governing Board will receive a detailed safeguarding report at each meeting, that will record any training requirements, it will also record all safeguarding activity that has taken place.

3.2 The Headteacher

At Elm Court School the Headteacher is responsible for:

- Identifying a senior staff member from the leadership team to be the Designated Safeguarding Lead (DSL) and Deputies (DDSL)
- Ensuring that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are followed by all staff.



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- Ensuring all staff and volunteers can raise concerns about poor or unsafe practices. Such problems are addressed sensitively by the whistle-blowing procedures
- Liaise with the LADO in the event of an allegation of abuse against a staff member or volunteer.

3.3 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Elm Court School. The critical role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school
- Work with external agencies and professionals on matters of safety and safeguarding
- Undertake training
- Raise awareness of safeguarding and child protection amongst the staff and parents
- Ensure that child protection information is transferred to the pupil's new school if they leave
- Be aware of pupils who have a social worker
- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.
- The DSL will carry out their role and responsibilities as outlined in Annex C of [Keeping Children Safe in Education](#) DfE (2025)

DSL has the added responsibility of online safety, including filtering and monitoring processes. All school devices and network will be monitored regularly.

During term time, the DSL or a deputy will always be available (during school hours) for staff in the school to discuss safeguarding concerns. Should a DSL be unavailable on the school site in person in exceptional circumstances, we will ensure they are available via telephone and any other relevant media.

The DSL at Elm Court school will represent our school at child protection conferences and core group meetings. Through appropriate training, knowledge and experience, our DSL will liaise with Children's Services and other agencies where necessary, make referrals of suspected abuse to Children's Services, participate in strategy discussions and other interagency meetings and contribute to the assessment of children.

The DSL will maintain records and child protection files, ensuring they are kept confidential and stored securely (see section 7 for more information).

The DSL is responsible for ensuring that all staff members and volunteers know our policy and the procedure they need to follow.

The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.

We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm and educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information with a social worker to make decisions in the best interests of the child's safety and welfare and help promote educational outcomes.



4 TRAINING & INDUCTION

The critical training elements are:

Induction Training – this is mandatory and should include:

- The child protection policy
- The behaviour policy
- The staff behaviour policy (sometimes called a code of conduct)
- The safeguarding response to children who go missing from education
- The role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
- KCSIE 2025
- Online safety

Designated Safeguarding Leads attend specific DSL training every two years. The school is subscribed to Lambeth safeguarding Hub. The DSL attends regular DSL cluster/forum meetings and information is filtered to staff during meetings and online.

All other staff receive regular safeguarding and child protection updates as required, but have specific training at least annually.

Members of the Governing Board of the school take part in mandatory safeguarding training (See KCSIE (2025), paragraph 81).

5 FILTERING AND MONITORING SYSTEMS

5.1 All Staff will receive online safety training as this is part of the overarching safeguarding approach of our school and understand their role within this process.

5.2 Governors will ensure that there is appropriate filtering and monitoring systems in place and review their effectiveness. Governors will also need to review DFE's filtering and monitoring standards and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards.

6. PROCEDURES FOR MANAGING CONCERNS

Elm Court School adheres to child protection procedures that have been agreed locally through the Lambeth Safeguarding Children Partnership to identify children and families in need of support.

All staff are encouraged to report concerns and not see these as insignificant. More often, however, problems accumulate and are evidenced by building up a picture of harm over time. It is crucial that staff record and pass on concerns immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity.

All concerns about a child or young person should be reported to the DSL without delay and recorded in writing using the Safeguarding platform. The report should detail:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved



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- A note of any action taken, decisions reached and the outcome.

All referrals will be made in line with Lambeth Children's Services procedures.

If there is a risk of immediate serious harm to a child, a referral should be made to Lambeth Integrated Referral Hub directly. Anybody can make a referral in these circumstances.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and by the procedures outlined in this policy should firstly raise the issue with the DSL and Headteacher. If any member of staff does not feel the situation has been addressed appropriately they should alert the Chair of the Governing Board. If they are still unhappy with the response at this point they should contact Lambeth Children Services directly with their concerns.

7. SPECIFIC SAFEGUARDING ISSUES

7.1 Contextual Safeguarding

At Elm Court School, we recognise that safeguarding incidents can be associated with factors outside of the school environment. This is known as contextual safeguarding. Training will ensure staff, visitors and volunteers know that this can take various forms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. We recognise that children with special educational needs (SEND) or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused by their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group within the community.

7.2 Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of child sexual abuse (CSE) is a form of child sexual abuse where an individual or group takes advantage of imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones etc without plausible explanation
- Gang association and isolation from peers/social networks
- Exclusion or unexplained absences from school, college, or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas that are known for sex work



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- Concerning use of the internet or other social media
- Self-harm or significant changes in emotional well-being.

7.3 Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods or regularly come home late; and
- Children who regularly miss school or education or do not participate in education.

7.4 County Lines and Serious Violence

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK) using dedicated mobile phone lines or another form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure victims’ compliance.

Children can quickly become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

At Elm Court School, we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines activity.

All staff should be aware of children who:

- Go missing **from school, education, home and care** are subsequently found in areas away from their own
- Have been the perpetrator or **alleged** perpetrator of serious violence (e.g. knife crime), as well as the victim.

We understand that children trapped in this exploitation may be forced into carrying weapons such as knives in an attempt at protecting themselves from others. We



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recognise that the experience of exploited girls can be very different from that of boys and that both boys and girls can be criminally and sexually exploited.

If a child is suspected to be at risk of or involved in county lines or serious violence, a referral should be made to the Lambeth Integrated Referral Hub.

7.5 Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour or as a single incident, between two people over the age of 16 who are 'personally connected'

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- Psychological, emotional, or other abuse.

People are 'personally connected' when they have been married to each other or civil partners or if the two people have been in an intimate relationship with shared parental responsibility for the same child or are relatives.

The definition of Domestic Abuse is particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Domestic abuse can occur inside or outside the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8 AM to 1 PM, Monday to Friday on 0204 513 9990 (charged at local rate).

7.6 Honour Based Abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses crimes committed to protect or defend the family's honour, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as a concern that a child might be at risk of HBA; the Designated Safeguarding Lead must be contacted urgently.



Female Genital Mutilation

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

Risk factors for FGM include:

- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elders from the country of origin
- Being taken on an extended holiday to the country of origin (especially before the summer holidays)
- Talk about a 'special' procedure to become a woman.

Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting, or standing and may even look uncomfortable
- Spending more time in the bathroom or toilet due to difficulty urinating
- Spending long periods away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo regular medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between the legs.

If staff have a concern regarding a pupil being at risk of HBA they should inform the DSL, who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Where FGM has taken place, since 31 October 2015, there has been a mandatory reporting duty placed on teachers. [Section 5B of the Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teacher should discuss any issues with the safeguarding lead. The duty does not apply to at-risk or suspected cases.

Forced Marriages

At Elm Court School we recognise that forcing a person into a marriage is a crime in England and Wales, since February 2023, a forced marriage is entered without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter a marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. Threats can be physical or emotional or psychological.



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The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

7.7 Preventing Radicalisation and Extremism

As part of the Counter Terrorism and Security Act 2015, schools must prevent people with becoming involved with or supporting terrorism. This is known as the 'Prevent Duty'.

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

Where staff are concerned that children and young people are becoming involved with or supporting terrorism or being susceptible to radicalisation into terrorism, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and can support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, indicating that they may need help or protection. Staff should use their judgement to identify children at risk of radicalisation and act proportionately.

All staff should be able to identify 'signs of possible abuse, exploitation or neglect' (previously read 'signs of possible abuse or neglect or neglect')

We are committed to ensuring that our pupils are offered a broad and balanced curriculum to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning.

7.8 Recognising Extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages like illegal organisations or other extremist groups



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- Out of character changes in dress, behaviour and peer relationships (but there are also compelling narratives, programmes networks that young people can come across online, so involvement with groups may not be apparent)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race, or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability. At Elm Court School, we will ensure that:

- Through training, staff, volunteers and governors understand radicalisation and extremism, why we need to be vigilant in school and how to respond when concerns arise
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies
- The DSL will make referrals by following our school procedures and attending Channel meetings as required.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.
- Records should include 'instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc'
- Through our curriculum we promote pupils' spiritual, moral, social and cultural development.

7.9 Child-on-Child Abuse and Sexual Harassment

At Elm Court School, all staff are trained so that they are aware that safeguarding issues can manifest themselves via child-on-child abuse and sexual violence. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing bodily harm
- Sexual violence and sexual harassment
- Up skirting
- Sexting (also known as youth-produced sexual imagery).
- Initiation/hazing type violence and rituals.

We recognise that children can be vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that by an adult. We understand that abuse can occur in intimate personal relationships between young people. Consensual and non-consensual sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children



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share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Staff must never tolerate or dismiss concerns relating to child on child abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in the worst-case scenario, a culture that normalises abuse leading to children accepting irregular and dangerous behaviour.

At Elm Court School, all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

Effective teaching strategies follows best practice in delivering safe and effective education.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child on child abuse. The DSL will respond to any problems related to child-on-child abuse in line with the guidance outlined in Part five of '*Keeping Children Safe in Education (2025)*'. If there are concerns or worries about developmentally inappropriate or harmful sexual behaviour, advice will be sought from the Harmful Sexual Behaviour (HSB) Team.

Support will depend on the circumstances of each case and the needs of the child; it may include completion of risk assessments to support children to remain in school whilst safeguarding other children and the victim, delivery of the early intervention in respect of and referral to Lambeth IRH and HSB team.

7.10 Modern Slavery

At Elm Court School, we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance on [Modern slavery: how to identify and support victims](#) for concerns of this nature.

7.11 Safeguarding responses to children absent from school and those children missing in education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. It is important the school's response to pupils and children who have unexplained and/or persistent absences from education help to identify the risk of abuse, exploitation and neglect, and in the case of absent pupils, this helps prevent the risk of them becoming a child missing education in the future.

• Information can be found in the department's statutory guidance: Children Missing Education.

We monitor attendance carefully and address poor or irregular attendance without delay.



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We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up-to-date contact numbers for parents/carers. The school have:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- We only take pupils off roll in consultation with Lambeth SEND as all our pupils have EHCPs this includes if the following circumstances apply -
 - leave school to be home educated
 - move away from the school's location
 - remain medically unfit beyond compulsory school age
 - are in custody for four months or more (and will not return to school afterwards)
 - are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take their place will be referred to the local authority.

When a pupil leaves the school, we will record their new school's name and expected start date.

At Elm Court School, we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are missing:

- An attendance register is taken at the start of the of each school day and again after lunch in the afternoon
- Staff will alert the DSL to any concerns regarding children absent from school
- The DSL will meet regularly with the Attendance Lead and other Inclusion Team members to ensure that each response is thorough and considers all the relevant information about individual children
- We will follow the procedures outlined in our attendance policy, including undertaking first-day calling and monitoring data to ensure we intervene early in cases of poor attendance or unexplained absences
- We address poor or irregular attendance with parent/carers at attendance panel meeting.

Home visits are conducted in liaison with our Safer Schools Officer

7.12 Mental Health

All staff at Elm Court School know that mental health problems can, in some cases, indicate that a child has suffered or is at risk of abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action needs to be taken by speaking to the DSL or a deputy. Relevant concerns are recorded electronically and accurately and the information is shared with parent and carers and relevant agencies if needed. Referrals are made to external professionals and the situation is monitored.



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At Elm Court School the Senior Mental Health Lead, Nilgun Salih, can be contacted at Elm Court School or by email salih.n@elmcourt.lambeth.sch.uk

We understand that where children have suffered potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and adulthood. Therefore, through training, staff know how children's experiences can impact upon their mental health, behaviour and education.

7.13 Online Safety

At Elm Court School, we recognise that technology and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety.

At Elm Court School, we manage this risk in school by ensuring that when using the school's network to access the internet, pupils are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness.

At Elm Court School, all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases, abuse will occur concurrently via online channels and in daily life. We know that children can also abuse their peers online. This abuse includes harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups and the sharing of offensive videos such as pornography.

We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the DSL and any parental engagement.

More details can be found in our Online Safety and Mobile and Smart Technology policies, which consider the 4Cs, content, contact, conduct and commerce.

7.14 Cybercrime

We understand that cybercrime is a criminal activity using computers and the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale or speed by computer) or 'cyber-dependent' (crimes that can be committed only by computer).

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners. Elm Court review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. NCSC.GOV.UK.

If there are concerns about a child in this area, the DSL will consider a referral to the [Cyber Choices programme](#), which aims to intervene where young people are at risk of committing or being drawn into low-level cyber-dependent or enabled offences and divert them to the more positive use of their skills and interests.

7.15 Artificial intelligence (AI)

Generative Artificial Intelligence (AI) tools are now widespread and easy to access.



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Elm Court School recognises that AI has many uses. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deep fakes', where AI is used to create images, audio or video hoaxes that look real.

Elm Court School will treat any use of AI to access or share harmful content or bully pupils in line with this policy and our anti-bullying policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually and Financially motivated incidents

Sexually Motivated Incidents- Involves an adult offender obtaining nude and semi-nudes directly from a child or young person using online platforms.

Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person.

- Quickly engaged in sexually explicit communications which may include the offender sharing an image first.
- Moved from a public to a private/E2EE platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information and contacts.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Financially Motivated Incidents- Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To Sexually/ Financially blackmail the child or young person, they may:



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- Groom or coerce the child or young person into sending nudes or semi-nudes, including computer generated imagery and financially blackmail them.
- Use images that have been stolen from the child or young person taken through hacking their account.
- Use digitally manipulated images, including AI-generated images, of the child or young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion or grooming and coercions can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person.
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first.
- Moved from a public to a private/E2EE platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

7.16 Children with special educational needs and disabilities or physical health issues

At Elm Court School, we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges.

At Elm Court School, we provide targeted support for pupils in liaison with Speech & Language Therapists (SaLT), Occupational Therapists (OT) and other therapists.

As a school we work to address each pupil's additional challenges along with ensuring appropriate communication support is in place.

Further information can be found in DFE:

- **SEND Code of Practice 0 to 25 years**
- **Supporting Pupils at School with Medical Conditions.**



And from specialist organisations such as:

- **The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service:**

Find your local IAS service (councilfordisabledchildren.org.uk)

- **Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.**

7.17 Private Fostering

A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, or cousins. Parents and private foster carers have a legal duty to inform the relevant local authority at least six weeks before the arrangement starts. Not doing so is a criminal offence. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse, neglect and exploitation or may be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools must report to the local authority where they know or suspect that a child is subject to a private fostering arrangement. School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the child's family to ensure they know their duty to inform the LA. The school itself must report fostering arrangements to the local authority.

On admission to the school, we will take steps to verify the adults' relationship to the child being registered.

7.18 Pupils who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. Our anti-bullying policy contains more detail on how we prevent bullying based on gender or sexuality. We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.



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When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD). We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

7.19 Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. Some children may be on Child in Need Plan (S17) CIN, others may be on Child Protection Plans (S47) CP, and will have social work involvement.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

7.20 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about Children Looked After legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.

We have an appointed designated teacher (Alejandro Alonso) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:



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- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with Virtual School Heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

7.21 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

8. RECORDS AND INFORMATION SHARING

If staff are concerned about the welfare or safety of any child at our school, they will record their concern on the agreed reporting form. Any concerns should be passed to the DSL without delay. Any information recorded will be kept in a separate named file, in a secure cabinet if a paper system is used and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within a school based on the need to know and the child's interests and understand that it remains strictly confidential.

Child Protection information will be kept up to date. A note of any action taken, decisions reached and the outcome.

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file, whether an electronic or paper system is used.

When a child leaves our school (including in-year transfers), the DSL will contact the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be within five days of an in-year transfer or in the first five days of starting a new term. Not providing information per the timescales can impact the child's safety, welfare and educational outcomes.

We will retain evidence to demonstrate how the file has been transferred. This may be in the form of a written confirmation of receipt from the receiving school and proof of recorded delivery.

Before a child leaves, we will consider if it would be appropriate to share any additional information with the new school or college to help them put in place the proper support to safeguard the child.



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Where a parent elects to remove their child from the school roll to home educate, the school will pass any safeguarding concerns to the Inclusion and Education Welfare Services within Lambeth.

9. WORKING WITH PARENTS & CARERS

Elm Court School is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them in understanding our statutory responsibilities in this area.

When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. This will be available on the school website or as a paper copy on request to the office. Parents and carers will be notified of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact Lambeth Integrated Referral Hub.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child *unless* doing so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the school's concerns about a child will not prevent the DSL from making a referral to Lambeth IRH in those circumstances where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the school requires parents to provide accurate up-to date information regarding:

- Full names and contact details of all adults with whom the child usually lives.
- Full names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above)
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission to the school in writing.

At Elm Court School, we are working in partnership with local Police and Lambeth Children's Services to identify and provide appropriate support to pupils.

10 CHILD PROTECTION CONFERENCES

At Elm Court School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will occur once a



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child has been made the subject of a Child Protection Plan to monitor the child's safety and the required reduction in risk.

All reports for child protection conferences will be prepared in advance using the guidance provided by the Lambeth Safeguarding Children Partnership. The information in the account will be shared with parents before the conference as appropriate. It will relate to the child's physical, emotional and intellectual development and presentation at school. To complete such reports, all relevant information will be sought from staff working with the child in school.

Child protection conferences can be upsetting for parents/carers. We will work openly and honestly with a parent/carer whose child has been referred to Children's Services or is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and we aim to achieve this in partnership with our parents/carers.

11. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

Allegations or concerns about an adult working in the school, whether as a teacher, supply teacher, other staff, volunteers, or contractors.

At Elm Court School, we recognise that adults working in the school may harm children. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay. If she is not on site, ask the office to contact her immediately. Any concerns about the Headteacher should go to the Chair of Governors, who can be contacted by email.

Concerns may come from various sources, for example, a suspicion, complaint, or disclosure made by a child, parent, or another adult within or outside the organisation. The Headteacher must decide whether the concern is an allegation or low-level concern. The term 'low-level' situation does not mean it is insignificant, but that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

11.1 Allegations

It is an allegation if the 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 or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(Person could be anyone working in the school or a college that provides education for children including supply teachers, volunteers and contractors.)

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors, if the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.



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The LADO's role is not to investigate the allegation but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors should contact the LADO directly via email at lado@lambeth.gcsx.gov.uk.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. If the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary).
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).



Additional considerations for supply teachers and all contracted staff

Where concerns are raised about an individual and the school is not their employer, we recognise that we still have a responsibility to ensure allegations are dealt with appropriately. If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will liaise with relevant parties, including the LADO, to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and or children's services, we recognise that the school will usually take the lead in investigating as we have direct access to any affected children and other school staff to collect the facts.
- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome. We inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments.
- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution



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The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports or allegations

If a report or allegation is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.



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The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file. (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.



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The school has a legal duty to refer to the Disclosure and Barring Service for anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of several listed offences and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. In that case, a referral will be made as soon as possible after the resignation or removal of the individual by advice from the LADO and HR.

11.2 Low Level Concerns: concerns that do not meet the harm threshold

Low-level concerns should be recorded in writing: (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 11.1 above.

Concerns may arise through:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:



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- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns as per section 11 of this policy.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.
- Weekly face-to-face meetings to discuss safeguarding information, total communication approaches and appropriate behaviour support approaches.
- Daily bitesize safeguarding facts during morning briefings.

Responding to low-level concerns

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

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

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

Record keeping

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 11.1 of this Policy, we will refer it to the LADO.
- Retained at least until the individual leaves' employment at the school.

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

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO by the Headteacher.

References

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



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

11.3 Whistleblowing

Where there are concerns about how safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the public, such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

12. RELEVANT POLICIES

To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded, the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Equalities including LGBTQ
- School Child Missing in Education
- Managing Allegations Against Staff
- Anti-Bullying
- Behaviour which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Recruitment & Selection (which adheres to Part 3 of Keeping Children Safe in Education 2025)
- Whistleblowing
- Attendance
- Online Safety, Data Protection and GDPR
- Filtering and Monitoring Process
- Health and Safety, including site security
- Harassment and discrimination, including racial abuse
- Meeting the needs of pupils with medical conditions
- First aid
- Educational visits, including overnight stays
- RSHE
- Working with Children with Autism
- Restrictive Physical Intervention Policy
-

12. SAFER RECRUITMENT



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At Elm Court School it is important that we adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our school. A robust Single Central Record process is in place. Governing bodies are involved with the recruitment and employment of staff to work with our children, we ensure they have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of (Part three) of KCSIE (2025).

Shortlisted candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. This information should only be requested from applicants who have been shortlisted. The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.

In addition, as part of the shortlisting process candidates will be informed that an online search as part of their due diligence will be conducted. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview.

Examples of the information we may ask for includes copies of documents used to verify the successful candidate's identity, right to work and required qualifications are kept on their personnel file. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. To comply with the requirements of the Data Protection Act 2018, we may choose to retain a copy, this would be for a valid reason, and it will not be kept for longer than six months. When the information is destroyed the school may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to. Schools do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record. Further information on handling DBS information can be found on GOV.UK.

Agency and third-party staff (supply staff)

When working with agencies and supply staff we must obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery). In respect of the enhanced DBS check, schools must ensure that written notification confirms the certificate has been obtained by either the employment business or another such business. We also ask for 2 references from previous employers and a copy of the enhanced DBS for our records. These documentations are received before employee begins work at Elm Court School.

Contractors

When Elm Court School use contractors to provide services, we set out our safeguarding requirements in school. We ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. For all other contractors who are not engaging in regulated activity



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relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Under no circumstances will a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Elm Court School will be responsible for determining the appropriate level of supervision depending on the circumstances. If an individual working at a school or college is self-employed, we carry out the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. Elm Court School has electronic photographic process of signing in and out of the school. Elm Court School always checks the identity of contractors on arrival at the school.

Visitors

Schools have different types of visitors, those with a professional role i.e. educational psychologists, social workers etc. those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity in school such as a sports day. For visitors provided via a third party see the paragraph 'Agency and third-party staff' above. Schools and colleges should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteacher uses her professional judgement about the need to escort or supervise such visitors.

Elm Court School safeguarding policies set out the arrangements for individuals coming onto their premises.

Alternative Provision

When Elm Court School places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

Safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures, and consequentially enshrined in its ethos. See Parts one and two of KCSIE 2024 for information about providing a coordinated whole school and college approach to safeguarding (KCSIE 2025).

13. STATUTORY FRAMEWORK

The following legislation and guidance have devised this policy:

- [Working Together to Safeguard Children](#) DfE (July 2018)
- [Keeping Children Safe in Education](#) DfE (2025)



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- [Guidance for Safer Recruitment- https://saferrecruitmentconsortium.org/Working Practices for Adults who work with Children and Young People in Education Settings](https://saferrecruitmentconsortium.org/Working Practices for Adults who work with Children and Young People in Education Settings) (May 2019)
- [What to do if you're worried a child is being abused DfE \(March 2015\)](#)
- [Information sharing: advice for practitioners providing safeguarding services DfE \(July 2018\)](#)
- [The Prevent duty: Departmental guidance for schools and childcare providers DfE \(June 2015\)](#)
- [Mandatory Reporting of Female Genital Mutilation- procedural information Home Office \(December 2015\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges DfE \(June 2021\)](#)
- [Teaching online safety in school DfE \(June 2019\)](#)
- [Mental Health and Behaviour in Schools DfE \(November 2018\)](#)
- [Data protection: a toolkit for schools DfE \(September 2018\)](#)
- [Promoting the education of children with a social worker \(June 2022\)](#)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2019\)](#)
- <https://www.lambethsaferchildren.org.uk>
- [The Voyeurism \(Offences\) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019. 138Project DE SHAME from Child net provides useful research, advice and resources regarding online sexual harassment.](#)

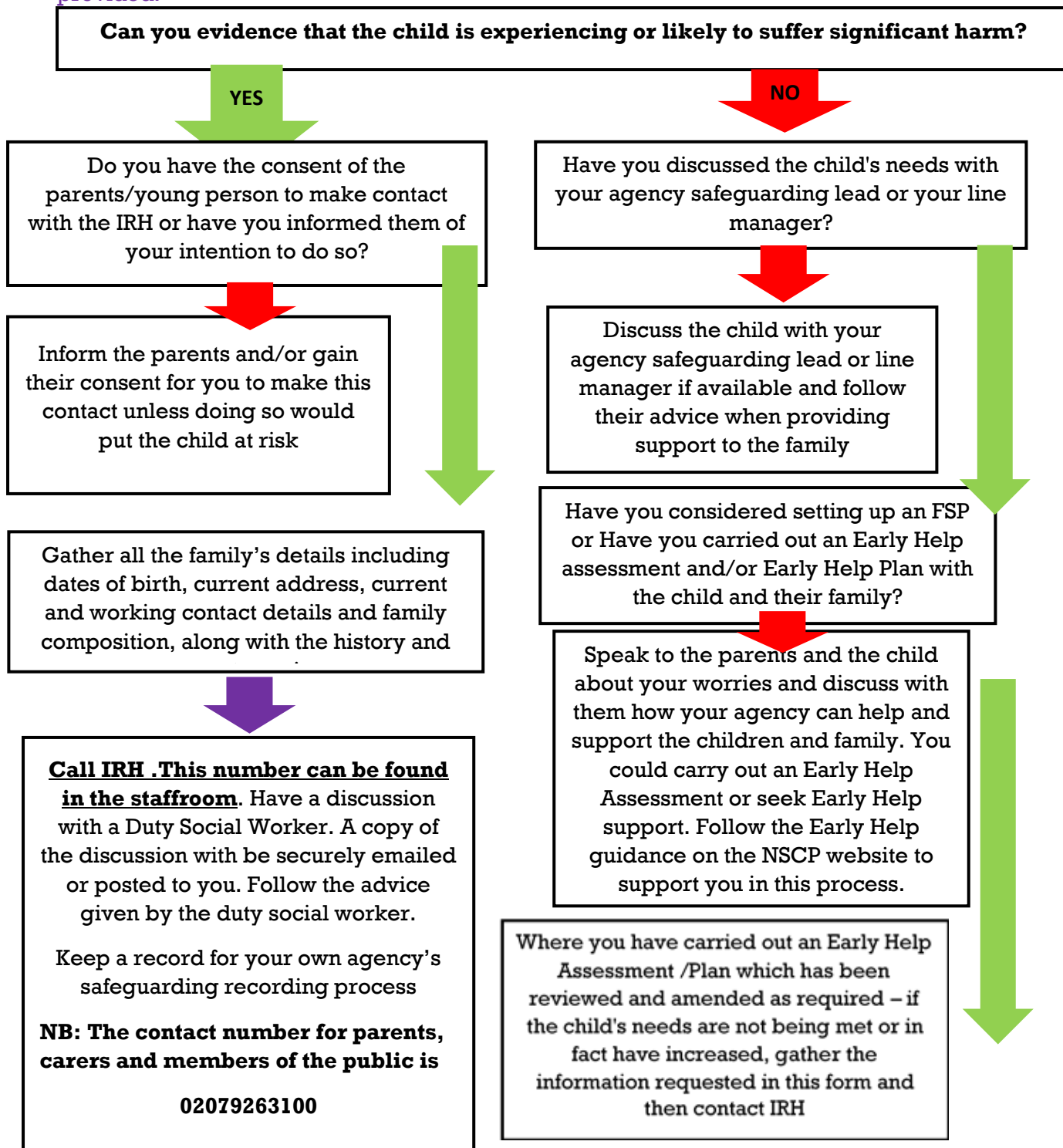
This policy was approved by the Governing Body July 2025

Review Date: July 2026



Appendix 1: Local Safeguarding Procedures Integrated Referral Hub

Before contacting the IRH, please answer the following questions and follow the advice provided:






Appendix 2: Advice for schools, colleges and alternative education providers where there are concerns about an adult who works within the setting.

[Links and guidance](#)

How to make a referral

1. Discuss your referral with Lambeth's Designated Officer, Andrew Zachariades, on **020 7926 4679** or **07720 828 700**
2. Download the **Allegations Referral Form**
3. Complete the form with as much detail as possible
4. Email the completed form to **LADO@lambeth.gov.uk** and the Integrated Referral Hub on **helpandprotection@lambeth.gov.uk**



Links

Lambeth Designated Officer:
Andrew Zachariades

Call 020 7926 4679

Call 07720 828 700

Download Allegations Referral Form

LADO@lambeth.gov.uk

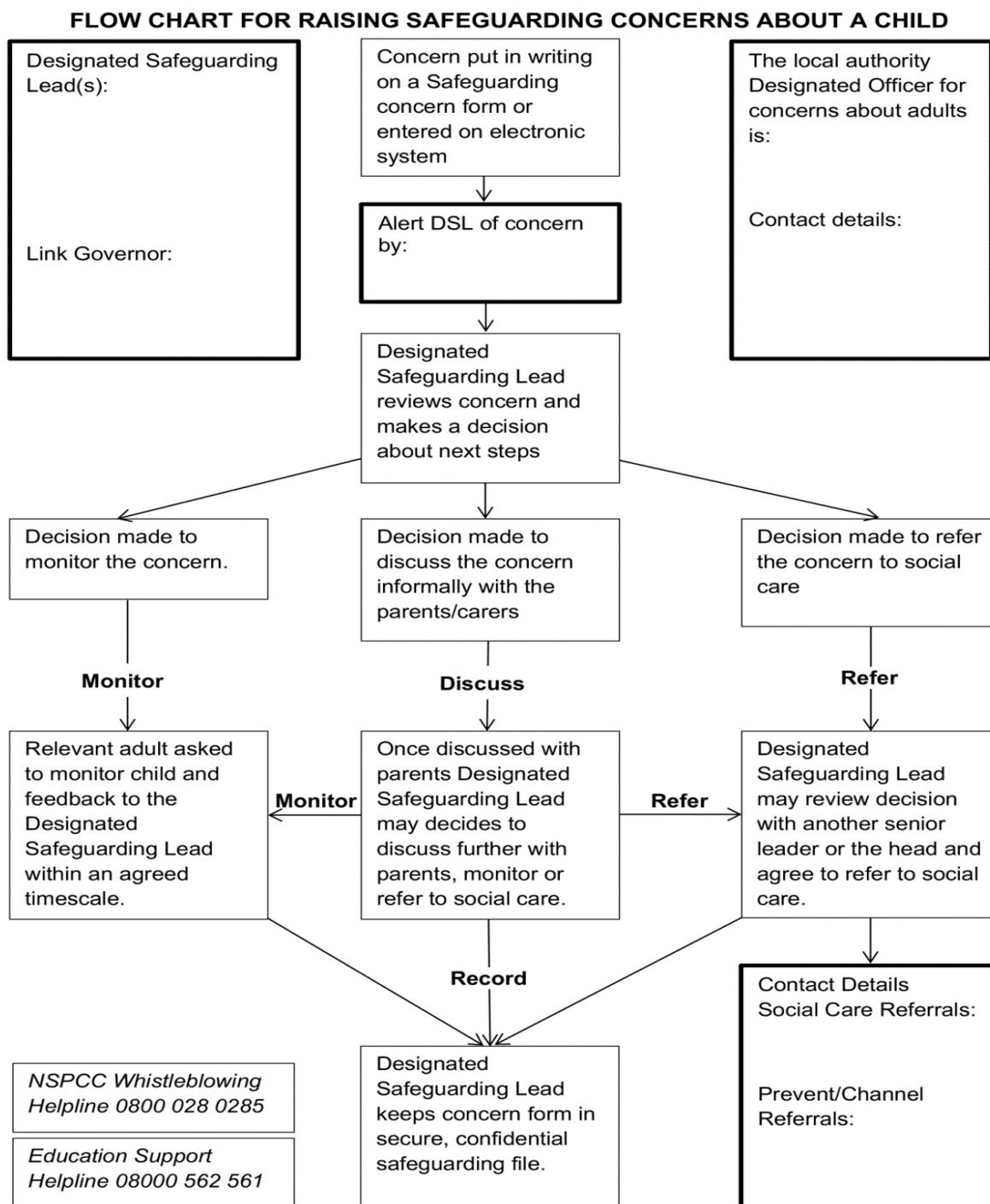
Integrated Referral Hub

Call 020 7926 3100

helpandprotection@lambeth.gov.uk



Appendix 3:



This policy will be reviewed in full by the Governing Board annually. Next Review September 2026:

Signature

Headteacher

Date:

Signature

Chair of Governors

Date:



Appendix changes 2025:

Section 7.15- page 18-

Updated definition of sharing nude and semi nudes to include computer -generated imagery

Section 2- page 4-

The following have been added to the list/amended:

Has experienced multiple suspensions and is at risk of, or has been permanently excluded from schools

Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending

Is frequently missing/goes missing from education, home or care (the word 'education' has been added)

Section 7.7- page 13-

Added 'the police or' to sentence 'This could include the police or Channel...'

Replaced 'being drawn into terrorism' with 'becoming involved with or supporting terrorism'

Section 7.9- page 14/15-

Clarified that the sharing of nude or semi-nude images/videos also includes 'pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video'

Added text to explain that teaching follows best practice in delivering safe and effective education

Section 7.16- page 19-

Updated first paragraph as follows: 'We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:'

Section 2- page 4-

Added 'cognitive understanding' to list of additional safeguarding challenges faced by pupils with SEND.

Section 7.18-Page 20-

Please note: the section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

The term 'trans' has been replaced with 'gender questioning' throughout this section



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Added paragraphs outlining the approach to supporting gender questioning pupils

Section 7.8- page 14-

Added that records should include 'instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc'

Section 7.7-Page 13-

Added that all staff should be able to identify 'signs of possible abuse, exploitation or neglect' (previously read 'signs of possible abuse or neglect')

Replaced 'being drawn into terrorism' with 'becoming involved with or supporting terrorism'

Section 12- Page 32-

Replaced 'The information we will ask for includes...' with 'Examples of the information we may ask for includes...'

Section 7.15-page 18-

Added new section on 'Assessing adult-involved nude and semi-nude sharing incidents'

Section 7.11-page 15-

Replaced 'to help identify the risk of abuse and neglect' with 'to help identify the risk of abuse, exploitation and neglect'

Section 7.3- page 10-

Amended first paragraph: 'Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.'

Section 7.2-page 9-

Amended first paragraph: Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence

Section 7.5-page 11-

Replaced last sentence of second paragraph with: 'This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects'

Section 7.7-page 13-



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Updated definition of radicalisation

Updated definition of extremism

Replaced 'being drawn into terrorism' with 'becoming involved with or supporting terrorism'

Replaced 'susceptible to an extremist ideology' with 'susceptible to radicalisation into terrorism'