Safeguarding and Child Protection Policy

Policy Number:	EDU.POL.020	Policy Owner Job Role	Safeguarding Assurance Manager
Issue Number:		Ratified By	Quality Director
Issue Date:	24.08.26	Service Type:	Education
		Applicable Services:	Schools
Contributors	Kate Martin (Regional Director),		
Mandatory Policy	Yes		
Note	This policy must not be amended without prior approval of the Education Director		

Headteacher	William Monteith
Designated Safeguarding Lead	Richard Mulhall
Deputy Designated Safeguarding Lead/s	Richard Duffy
Mental Health First Aider/s	Nicola Wilkinson
Prevent Lead	Richard Mulhall
LAC / PLAC Lead	Amanda Sheppard
Safeguarding Governor	Martin Keightley
Chair of Governing Body	James Madine
Director of Safeguarding	Julie Hamilton
LADO *name and authority	Jane Darrington, Calderdale Local Authority

Contents

1 Supporting Documents
2 Introduction
3 Equality Statement
4 Aim
5 Definitions
6 Confidentiality
6.1 Information Sharing
6.2 Whistleblowing
7 Allegations of abuse by a pupil against another pupil/s (child-on-child abuse)
7.1 Procedures for dealing with allegations of child-on-child abuse
7.2 Creating a supportive environment to minimise the risk of child-on-child abuse
7.3 Sharing of nudes and semi-nudes (sexting)
7.4 Child-on-Child Abuse
8 Pupils with Increased and Specific Vulnerabilities
9 Allegations against Staff – including low level concerns
10 Responsibilities
11 Training

Copyright – to be used only with prior and express permission of Keys.

12 Appendices:

Appendix 1 – Procedures for Reporting and Recording Concerns
Appendix 2 – Recoding and Storing Data
Appendix 3 – Recruitment and Selection Process
Appendix 4 – Designated Leads in School
Appendix 5 – Reporting and Referring contact Information
Appendix 6 – Contextual Safeguarding Information and Location Risk
Appendix 7 – Safeguarding Oversight and Information for Display
Appendix 8 – Checklist for Staff and Governors
Appendix 9 – School Specific Mental Health Guidance
Appendix 10 – Template Pupil Safey Plan
Appendix 11 – Version Control table

1. Supporting Documents

This policy is based on the Department for Education's (DfE's) statutory guidance documents Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026 update); along with Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014.

This policy has also been created in accordance with the following key documents:

- SEND Code of Practice
- Regulatory Inspection Handbooks (Reviewed summer 2026)
- Equality Act 2010
- Human Rights Act 1998
- Working Together to improve school attendance (July 2026 update)
- Prevent Duty Guidance (2024 update)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015

This policy should be read in conjunction with the following Keys Education policies:

- RSHE Policy (26/27)
- Behaviour Policy (26/27)
- Positive Handling and Physical Intervention Policy (26/27)
- Anti-Bullying Policy (26/27)
- Risk Assessment Policy (26/27)
- Supervision of Pupils Policy (26/27)
- Mobile Phone Policy (26/27)
- SEND Policy (26/27)
- First Aid Policy (26/27)
- Allergy Safety Policy (26/27)
- Medical Conditions and Medication Policy (26/27)
- Mental Health and Wellbeing Policy (26/27)
- Suspension and Permanent Exclusions Policy (26/27)
- Alternative Provision Policy (26/27)
- Attendance Policy (26/27)
- Children Missing Education Policy (26/27)

Copyright – to be used only with prior and express permission of Keys.

- Admissions Policy (26/27)
- Staff Code of Conduct Policy (26/27)
- Whistleblowing Policy (26/27)

Related policies are held within RADAR in the School's policy folder.

2. Introduction

Broadwood School is committed to creating a culture where:

- Children feel safe.
- Concerns around pupils' safety and/or welfare are identified early.
- Concerns are acted upon promptly.
- Children are listened to.
- Children know how to access support.
- Staff understand their safeguarding responsibilities.
- Safeguarding is embedded throughout all school activities.
- The welfare of the child is always paramount to all members of our school community.

3. Equality Statement

At Broadwood School the welfare of the child is paramount at all times. All decisions made by school staff will place the child's safety, wellbeing and best interests at the centre of decision-making.

We also recognise that our pupils often have additional vulnerabilities due to their Special Educational Needs and Disabilities (SEND) – including communication needs, social, emotional and sensory needs and mental health needs. This can often sit alongside a history of trauma (including education-based trauma) and complex attachment profiles, and a range of adverse childhood experiences. These factors can increase both the risk of abuse taking place but also increase the barriers to recognising and reporting abuse.

All staff at Broadwood School are committed to anti-discriminatory practice and recognise our pupils diverse needs and circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

In addition to their SEND, we also give special consideration to pupils who may have additional vulnerabilities due to the following:

- Pupils who are young carers.
- Pupils who may face discrimination due to ethnicity, religion, gender identification or sexuality.
- Pupils and families where English is an additional language (EAL).
- Where pupils are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Pupils who are at increased risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalization.

Copyright – to be used only with prior and express permission of Keys.

- Pupils who are refugees or asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Pupils with a family member in prison.
- Pupils who are looked after or previously looked after.
- Pupils who are missing or absent from education for prolonged periods or have a pattern of frequent absence.
- Pupils who have a chronic or life limiting illness.
- A pupil whose parent/carer has expressed an intention to remove them from school to be home educated.

4. Aim

The aim of this Safeguarding and Child Protection Policy is to ensure that every pupil at Broadwood School is safe, valued, respected, and able to learn and thrive within a secure environment. The policy provides a clear framework for preventing harm, identifying concerns at the earliest opportunity, and responding effectively to safeguard children and young people. It promotes a culture of vigilance, shared responsibility, and inclusive practice, ensuring that all staff, governors, volunteers, and partners work together to protect pupils' welfare, promote their wellbeing, and uphold their rights.

5. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. It can include physical, sexual or emotional elements.

Abuse can be perpetuated by adults or children; it can be perpetrated by individuals, groups and organized networks. Abuse may also include children causing harm to adults (sometimes called 'child to parent' or 'child to caregiver' abuse.)

Neglect is also a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual

Copyright – to be used only with prior and express permission of Keys.

imagery) is where children 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.

Children, includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA).
- Integrated Care Boards (previously known as clinical commissioning groups) for an area within the LA.
- The Chief Officer of Police for an area in the LA area.

'Victim' is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

6. Confidentiality

Confidentiality is an important element of safeguarding practice; however, safeguarding concerns must never be kept secret.

Effective safeguarding depends upon timely information sharing and all staff understand that fears about sharing information must never stand in the way of promoting the welfare and safety of children. Information will only be shared on a need-to-know basis with professionals who have a legitimate safeguarding responsibility.

The school recognises that:

- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of safeguarding information where this is necessary to protect a child.
- Special category personal information may be shared without consent when safeguarding a child or vulnerable person.
- Staff must never promise confidentiality to a child who makes a disclosure.
- The wishes and feelings of the child will always be considered, but safeguarding responsibilities remain paramount.
- Parents/carers will normally be informed of safeguarding concerns unless doing so would place a child at increased risk of harm.

Copyright – to be used only with prior and express permission of Keys.

Where allegations involve sexual violence or sexual harassment, the Designated Safeguarding Lead (DSL) will carefully balance:

- The wishes of the child.
- The need to protect the child.
- The need to protect other children.
- Statutory reporting requirements.

The school follows the government's Information Sharing Advice for Safeguarding Practitioners and the seven golden rules of information sharing.

All safeguarding records are maintained securely on CPOMS and are only accessible to authorised personnel. Safeguarding records are retained and transferred in line with statutory guidance.

6.1 Information Sharing

The school recognises that safeguarding is a shared responsibility requiring effective partnership working.

We work closely with:

- Children's Social Care,
- Police,
- Health services,
- Virtual School Heads,
- Local Safeguarding Children Partnerships,
- Integrated Care Boards,
- Alternative Providers,
- Therapeutic and Clinical Services,
- Other education providers.

All staff understand their responsibility to:

- Report concerns promptly.
- Record concerns accurately.
- Share information with the DSL without delay.
- Support multi-agency safeguarding arrangements.
- Contribute to assessments and safeguarding plans when required.

Where a child transfers to another education setting, safeguarding records will be transferred securely and separately from the educational file through CPOMS or secure transfer systems within:

- Five working days for an in-year transfer; or
- The first five days of a new term.

Where concerns are complex, the DSL will speak directly with the DSL at the receiving school to ensure a clear handover of information.

Copyright – to be used only with prior and express permission of Keys.

6.2 Whistleblowing

The school promotes a culture of openness, transparency and professional challenge. All staff have a duty to raise concerns where they believe:

- Safeguarding procedures are not being followed.
- A child may be at risk of harm.
- Poor or unsafe practice may place children at risk.
- A colleague's conduct is inconsistent with professional expectations.

A culture of openness and professional dialogue is established at Broadwood School however, in the event that this has not been appropriate or successful, or that colleagues have not felt able to use this approach then then the following routes are available:

Concerns should normally be raised with:

- The headteacher and/or DSL (then)
- The regional director (then)
- The education director.

In the case of Safeguarding concerns however, staff can also contact:

- The Safeguarding Governor (Martin Keightley)
- The Director of Safeguarding (Julie Hamilton)
- The Chair of the Proprietary Board (David Manson)

Staff can also contact Human Resources.

Staff may also access external whistleblowing routes as detailed in the wider Keys whistleblowing policy available of RADAR or the Circle. This includes an anonymous whistleblowing service.

7. Child-on-child abuse

It is recognised that children may sometimes abuse other children. Such behaviour will not be tolerated or dismissed as banter, humour, or part of growing up, as this could contribute to inappropriate behaviour and an unsafe environment for pupils.

7.1 Allegations of abuse by a pupil against another pupil/s (known as child-on-child abuse)

Incidents where pupils harm others are typically addressed thoroughly and appropriately under the school's behaviour policy. However, this policy will apply to cases involving behaviour that is significant enough to be considered a safeguarding concern. Some of the reasons for this may include, but are not limited to:

- Abusive or violent behaviour that may constitute a criminal offensive.
- Abusive or violent behaviour that may place pupils at an ongoing risk.
- Discriminatory behaviour, including racism and faith targeted abuse.
- Behaviour that was sustained, planned or promoted (advertised).

Copyright – to be used only with prior and express permission of Keys.

- Behaviour that involved coercion or forcing children to use drugs or alcohol.
- Any involvement of sexual exploitation, sexual abuse, or harassment - including indecent exposure, sexual assault, upskirting, sharing of indecent images. (Including nudes and semi-nudes), or creating deep-fake explicit images.
- Abusive or violent behaviour that has been filmed, shared online, or distributed by other means.
- Any behaviour that is linked to any other concerning behaviour.

7.2 Procedures for dealing with allegations of child-on-child abuse

Allegations by a pupil against another pupil will follow established safeguarding procedures (see appendix 1 section A and B), reported to the DSL and recorded on CPOMS.

Ensure reporting to police is done quickly and in line with guidance around children and the law (access to responsible adults and informing parents/carers).

If the incident involves a potential criminal offence and there are delays in the criminal process, the DSL will cooperate with the police and other agencies as needed, while taking necessary measures regarding pupil safety and discipline.

7.3 Creating a supportive environment to minimise the risk of child-on-child abuse

The importance of proactive action to reduce risks associated with child-on-child abuse and fostering a supportive reporting environment is acknowledged.

To support this, the school will:

- Address derogatory or sexualised language and inappropriate behaviour between pupils.
- Monitor issues that affect different genders.
- Use the curriculum to educate pupils about appropriate, socially expected, and criminal behaviour, with particular attention to pupils with SEN who may find these concepts challenging.
- Ensure accessible reporting systems for all pupils.
- Remain alert to reports of violence or harassment, particularly those of a sexual or discriminatory nature, which may indicate broader issues. Identified issues will be handled through curriculum adaptation, staff training, policy updates, and, if suitable, collaboration with safeguarding partners.
- Provide support for pupils affected by or witnessing child-on-child abuse, ensuring that all parties involved are protected from bullying or harassment.
- Train staff to recognise indicators of child-on-child abuse and to respond appropriately, maintaining an outlook that such abuse could occur even in the absence of reports.

Disciplinary measures may proceed alongside external investigations, such as those by

Copyright – to be used only with prior and express permission of Keys.

law enforcement. The school will determine on a case-by-case basis whether disciplinary actions might affect ongoing investigations and will consult with appropriate authorities as needed. Consideration will also be given to circumstances where conducting an internal review may not be reasonable during an independent investigation.

7.4 Sharing of nudes and semi-nudes (sexting)

Current guidance for educational settings (UK Council for Internet Safety, 2024) defines this as sending or posting nude or semi-nude images, videos, or live streams online by individuals under 18. Alternative terminology may include 'dick pics' or 'pics'. Motivations behind sharing such imagery may not always be sexual or criminal.

This guidance does not apply to adults sharing images of individuals under 18. Such behaviour is categorised as child sexual abuse and must be reported to police immediately.

This includes where a pupil has reached the age of 18.

All staff are required to follow reporting and recording protocols as outlined in Appendix 1 Sections A and B.

Staff must not:

- Delete any image or instruct a pupil to do so.
- View, copy, print, share, store, or retain such imagery or ask a pupil to do so; doing so can constitute a criminal offence. If imagery is viewed inadvertently, staff must report this to the DSL in writing immediately.

In exceptional situations, the DSL (or equivalent) may view the image solely for safeguarding purposes, using professional judgement.

Referring to the police

Decisions to refer incidents to the police or social care will be made individually, considering all relevant context. Where referral is required, the DSL (or Headteacher) will contact the police via 101.

8. Specific areas of concern and pupils with specific vulnerabilities

Mental Health (see also appendix 9 and 10)
At Broadwood School we recognise that Mental Health concerns may also quickly become safeguarding concerns, and that pupils with SEND, or those who have experienced trauma, are more likely to experience some mental health difficulties at some point in their lives.

Where mental health concerns become safeguarding concerns, safeguarding procedures will take precedence, and referral pathways will be activated. School leaders will also consider use of safety plans (appendix 9 and 10).

Copyright – to be used only with prior and express permission of Keys.

Our school works closely with the clinical team to ensure all staff have a developed understanding of mental health needs and signs to look out for.

Prejudiced based-harm or discrimination
All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Gender Identity and Social Transitioning
The school recognises that children who are questioning their gender may experience additional vulnerabilities including:

- Bullying
- Discrimination
- Social isolation
- Exploitation
- Poor mental health outcomes

All pupils will be treated with dignity, respect and compassion, and all adults will approach conversations with an empathetic professional curiosity. All conversations related to gender questioning and social transitioning should be logged on CPOMS.

The school will:

- Take a child-centred approach.
- Work closely with parents and carers, unless to do so would put the pupil at risk of harm*.
- Consider wider safeguarding vulnerabilities, and developmental, SEND profiles.
- Seek appropriate clinical guidance where required.
- Carefully assess any proposed social transition arrangements, and unless unsafe to do so, no school should consent to socially transition a pupil without consent or knowledge of parent/carers.
- Maintain detailed safeguarding records logging clearly all decisions made, actions taken and the rationale behind these.
- Ensure a pupil who has socially transitioned is treated with dignity and respect and given access to appropriate facilities to maintain this.
- Give consideration to children who are living in stealth (that is those who have socially transitioned pre-puberty, and whose biological sex may not be known to their peers or to a wider staff team) present a significant vulnerability. Staff will be especially aware of the risk as children in this category approach key milestones such as adolescence and puberty.

**Where a pupil requests social transition without parent/carer knowledge, the Headteacher, Education Director, Safeguarding Director and other relevant*

Copyright – to be used only with prior and express permission of Keys.

professionals will be consulted before decisions are made about what information should be shared in the child's best interests.

Pupils with Special Educational Needs or Health Conditions

We acknowledge that pupils with special educational needs (SEN) or certain health conditions may experience heightened safeguarding challenges and are statistically more susceptible to abuse than their peers.

Recognising abuse and neglect within this group can present additional complexities, such as: -

- Attributing indicators of possible abuse—including changes in behaviour, mood, or injury—solely to the child's needs or health condition without adequate investigation;
- The potential for pupils with SEN, disabilities, or specific health conditions to be disproportionately affected by behaviours such as bullying, even if they do not display outward signs;
- Communication barriers and challenges in reporting or managing these concerns.

To address these issues, we provide targeted training for staff on specific safeguarding considerations related to pupils with SEN and health conditions.

Pupils with a Social Worker

Some pupils require the support of a Social Worker due to safeguarding or welfare concerns. We recognise that adverse experiences and trauma can increase a child's vulnerability to further harm and impact attendance, learning, behaviour, and mental health. The DSL and all staff members collaborate closely with social workers to protect vulnerable children.

When it is known that a pupil has a social worker, the DSL always considers this information to ensure decisions prioritise the pupil's safety, welfare, and educational outcomes. For instance, this may guide responses to:

- Unauthorised absences or missing education where safeguarding risks are identified;
- Provision of pastoral or academic support as appropriate.

Looked-after and Previously Looked-after Children

We are committed to ensuring that staff possess the knowledge, skills, and understanding necessary to safeguard looked-after and previously looked-after children. Specifically, we ensure that:

- Relevant staff members are informed about children's legal care status, contact arrangements with birth parents or individuals with parental responsibility, and current care provisions;

Copyright – to be used only with prior and express permission of Keys.

- The DSL maintains up-to-date details of each child's social worker and relevant virtual school headteachers.

The headteacher is responsible for promoting the educational achievement of looked-after and previously looked-after children. As part of this role, the Headteacher will:

- Work in partnership with the DSL to ensure safeguarding concerns regarding looked-after and previously looked-after children are addressed swiftly and effectively;
- Collaborate with virtual school heads to support and enhance the educational progress of these children.

9. Concerns about a staff member, supply teacher, volunteer or contractor

If there are concerns regarding any individual employed in the school, whether directly or through a contract, who may pose a risk of harm to children, or if an allegation is made, all staff must report this to the designated safeguarding lead (DSL) and/or the headteacher immediately, and no later than the end of the working day. Should the concern or allegation pertain to the headteacher, it is the responsibility of all staff members to notify the Chair of Governors, James Madine.

The headteacher or the chair of governors will then proceed in accordance with the procedures outlined in appendix 1 and 5, where applicable.

If a conflict of interest exists in reporting a concern or allegation about any individual working within the school to the DSL or headteacher, staff must report the matter directly to the regional executive headteacher, (where one is in place) or the regional director in the first instance. They may also report their concern to the chair of governors if this is a preferred choice.

Low Level Concerns

A low-level concern refers to any issue, regardless of its significance, including those that may simply cause unease or a sense of 'nagging doubt'. Such concerns arise when an adult working in or on behalf of the school is perceived to have acted in a manner inconsistent with the Group's code of conduct—this encompasses inappropriate conduct outside of work—but does not meet the threshold for an allegation or warrant a referral to the local authority designated officer. **And will be recorded on the Schools Low Level Tracker.**

Examples of low-level concerns include, but are not limited to:

- Demonstrating excessive familiarity with pupils, leading to blurred boundaries;
- Displaying favoritism or engaging with a pupil one-on-one in a secluded area or behind a closed door;
- Using language that is inappropriate or offensive.

Copyright – to be used only with prior and express permission of Keys.

All staff are required to report low level concerns to the headteacher at the earliest opportunity. Whenever feasible, this should be communicated via email; if reported verbally, the headteacher will document the conversation in writing.
Headteachers are responsible for maintaining comprehensive records of all low-level concerns and actions taken. Using the low-level tracker form.

10. Responsibilities

Safeguarding and child protection are collective responsibilities. This policy is applicable to all staff, volunteers, and governors within the school and aligns with procedures set forth by the three safeguarding partners. The scope also extends to cover school and any off-site activities. It is our duty to ensure any alternative provision employed upholds robust and appropriate safeguarding measures. The practices described herein are consistent with the Non-Association Independent School Inspection Handbook, particularly concerning leadership and management, where safeguarding serves as a limiting judgement factor—as well as the standards set out in Independent School Standards. Clear accountability, escalation protocols, and demonstrable safeguarding practices directly contribute to positive inspection outcomes; thus, all staff must be fully conversant with their obligations.

All staff are required to:

- Read all of and understand Part One of *Keeping Children Safe in Education* (KCSIE) review it annually and affirm their understanding via a signed declaration each academic year.
- Reinforce online safety when communicating with parents/carers, including guidance on children's online activities.
- Provide safe spaces for LGBTQ+ pupils to express concerns.

All staff will also be aware of and utilise:

- The school's safeguarding infrastructure (this policy, behaviour policy, online safety policy, medication and allergy policies), risk assessments, CPOMS, DSL/DDSLs, provide response protocols to any significant operational issues.
- Their role in early intervention (identifying emerging concerns, liaising with the DSL/DDSLs, and sharing information appropriately).
- Procedures for referring cases to children's social care and statutory assessments, and their potential involvement in these processes.
- Appropriate responses to child disclosures of abuse or neglect, including FGM, maintaining confidentiality, and collaborating with professionals.
- Indicators of abuse or neglect and specific issues such as peer-on-peer abuse, CSE, CCE, serious violence/county lines, radicalisation, and FGM.
- The importance of reassuring children that their concerns are taken seriously and support will be provided.
- Protocols around contextual safeguarding. Recognition that risks may arise both inside and outside the home, in school, or online.

Copyright – to be used only with prior and express permission of Keys.

- Policies and strategies promoting support for LGBTQ+ children, or those perceived as such, who may experience additional risks.
- Understanding that children with SEN are at greater risk and may face further vulnerabilities compared to their peers without SEN.
- Policies and strategies promoting supporting pupils with Mental Health as a Safeguarding concern and the pathway to follow, following a concern.

Designated Safeguarding Lead (DSL)

The DSL holds primary responsibility for child protection and safeguarding, including online safety and filtering/monitoring.

DSL

- Keeps leaders informed.
- Liaise with the local authority, LADO, police, and safeguarding partners.
- Maintain awareness of local specialist support available for victims and alleged perpetrators.
- Ensure the presence of an "appropriate adult" during police involvement with pupils.
- If the DSL is off the premises, they will ensure that all staff are made aware of their absence and who they should report concerns to and in what manner.

Headteacher Responsibilities

The headteacher is accountable for:

- Inducting all staff and volunteers (including temporary personnel) into the school's safeguarding systems and procedures and ensuring adherence to referral processes.
- Acting as the "case manager" for allegations concerning staff or volunteers.
- Making determinations on low-level concerns (consulting the DSL as appropriate).
- Communicating this policy to parents/carers and ensuring publication on the school website.
- Providing the DSL with sufficient time, training, and resources.
- Ensuring that safeguarding data is effectively reported to governors at least once a term to enable them to maintain sufficient strategic oversight of safeguarding compliance and any serious or significant events.

Governing Board Responsibilities

The governing board shall:

- Implement a whole-school approach to safeguarding, integrating it across all policies and processes.
- Approve and annually review this policy, ensure compliance, and hold the Headteacher accountable.

Copyright – to be used only with prior and express permission of Keys.

- Fulfil duties pertaining to the Human Rights Act 1998, Equality Act 2010, and local safeguarding arrangements.
- Appoint a senior board-level lead (Julie Hamilton, Group Safeguarding Director) independent of the DSL, to oversee the efficacy of safeguarding policies.
- Ensure mandatory safeguarding/child protection training for all staff, inclusive of online safety, with regular updates.
- Oversee the implementation of suitable filtering and monitoring systems, ensuring comprehension among staff and alignment with DfE standards.
- Grant the DSL the requisite authority, resources, and time necessary to execute their role.
- Ensure processes are established for managing low-level concerns and compliance with these procedures (see para 9.2).
- Appoint a governor as "case manager" should there be allegations against the headteacher.

Contextual Risk Assessment (also see appendix 6)

Contextual Risk Assessments identify risks to pupils beyond the home, including within the local community and physical risks in or near the school environment. These assessments must be completed at the beginning of the school year in accordance with KCSIE updates and reviewed at the start of each term by the DSL and Leadership Team. Templates should be completed comprehensively and updated with input from local intelligence sources (police, local authority safeguarding teams, and community partners). Reviews will be minuted, and outcomes communicated to staff as appropriate. Governors will review the updated assessments each term.

Oversight and Quality Assurance

Governors, the education director, and the keys safeguarding compliance team have explicit oversight functions, including regular analysis of safeguarding data, termly reviews of contextual safeguarding risk assessments, and clear escalation procedures in instances where risks or deficiencies are identified. This structure satisfies inspection criteria requiring governance to demonstrate strategic challenge and effective oversight. Further details can be found in the appendices.

Preventative Education Responsibilities

The school plays an integral part in preventative education, adopting a whole-school approach to equip pupils with the knowledge and skills necessary for life in contemporary Britain. A zero-tolerance culture towards sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment underpin this work, supported by our:

- Behaviour Policy.
- Pastoral support system.
- Regularly delivered, inclusive PSHE and RSHE curriculum encompassing:
  - Healthy and respectful relationships.
  - Boundaries and consent.
  - Stereotyping, prejudice, and equality.

Copyright – to be used only with prior and express permission of Keys.

- Hate speech versus free speech.
- Body confidence and self-esteem.
- Recognition of abusive relationships, including coercive and controlling behaviours.
- Laws relating to sexual consent, exploitation, abuse, grooming, harassment, rape, domestic abuse, forced marriage, honour-based violence, FGM, and access to support.
- What constitutes sexual harassment and sexual violence, and unequivocal condemnation of such behaviour.
- Bullying and discrimination (including racism, ableism, sexism, homophobia, transphobia, and other forms of prejudice).
- Online safety (privacy, digital footprint, misinformation/disinformation, cyberbullying, gaming risks, AI/deepfake challenges).
- Mental and physical health and self-care.
- Diversity and inclusion (celebrating differences, disability awareness, LGBTQ+ inclusion).
- Exploitation and broader contextual risks.
- Economic wellbeing and online pressures (advertising, scams, gambling, financial decision-making).
- Preparation for independence (safe travel, responsible decision-making, personal responsibility).
- Our school is dedicated to tackling violence against women and girls. We will implement preventative education programmes that address this issue, promoting a culture of respect and safety for all pupils. Staff will be trained to recognise and respond to signs of violence and abuse, ensuring that appropriate support and interventions are provided.

11. Training

Staff and governors should consult *Appendix 8: Checklist for Governors*, which outlines statutory duties and procedural requirements for induction and refresher training.

All staff

All staff participate in safeguarding and child protection training as part of their induction, including training related to whistleblowing procedures and online safety, to ensure familiarity with the school's safeguarding systems and responsibilities, as well as recognition of potential indicators of abuse or neglect.

Training is updated regularly and designed to:

- Be embedded within the whole-school safeguarding policy, wider staff training, and curriculum planning.
- Align with the guidance provided by safeguarding partners.
- Address online safety expectations, roles, and responsibilities regarding filtering and monitoring.

Copyright – to be used only with prior and express permission of Keys.

- Reference Teachers' Standards, supporting expectations that all teachers:
  - Manage behaviour appropriately to maintain a safe environment.
  - Understand the needs of all pupils.

All staff complete training on the government's anti-radicalisation strategy, *Prevent*, aimed at recognising children at risk of involvement in terrorism and addressing extremist ideas.

Ongoing safeguarding and child protection updates, including topics on online safety, are provided as needed, and at least annually (for example, via emails, e-bulletins, or staff meetings).

Volunteers receive relevant training where applicable.

The DSL and Deputy DSLs

Richard Mulhall, the Designated Safeguarding Lead (DSL) and Richard Duffy, the Deputy Designated Safeguarding Leads (DDSL) will:

- Undertake appropriate level 3 child protection and safeguarding training at least every two years.
- Update Prevent training every two years as well as when guidance changes.

In addition, the DSL and DDSLs will update their knowledge and skills at regular intervals, and at least annually, in order to:

- Understand and keep up with any developments relevant to their role;
- Maintain the knowledge and skills required to carry out the role effectively;
- Understand local safeguarding arrangements and referral pathways; and
- Remain aware of emerging safeguarding risks and national developments.

They also update their knowledge and skills regularly, at least annually, using resources such as e-bulletins, networking with other DSLs, attending Keys Education DSL events, or reviewing current safeguarding developments.

Governors

All governors complete level 3 safeguarding and child protection training (including online safety and Prevent training) during their induction. They complete regular updates in line with Keys compliance – usually every three years or when guidance changes. This ensures they:

- Possess the necessary knowledge and information to perform their functions and understand their responsibilities, including providing strategic challenges.
- Can confirm that safeguarding policies and procedures are effective in delivering a comprehensive approach to safeguarding.

The chair of governors receives additional training in managing allegations, as they may need to act as the 'case manager' if an allegation is made against the headteacher.

Copyright – to be used only with prior and express permission of Keys.

Recruitment – interview panels

At least one member of every interview panel completes safer recruitment training, which covers at minimum the contents of Keeping Children Safe in Education and complies with local safeguarding procedures.

Staff who have contact with pupils and families

Staff working directly with children and families participate in supervision sessions with their line manager. These sessions offer support, coaching, training, promoting the interests of children, and provide opportunities for confidential discussions of sensitive

Copyright – to be used only with prior and express permission of Keys.

12. Appendices:

Appendix 1: Procedures for Reporting and Recording

Recognising Abuse and Taking Action

All staff members, volunteers, and governors are required to adhere to the following procedures in the event of a safeguarding concern.

Please note: In this and subsequent sections, any reference to the designated safeguarding lead (DSL) also applies to any deputy DSL.

SECTION A: Immediate Actions if a Child is Suffering or Likely to Suffer Harm, or is in Immediate Danger

1. Report the concern to the DSL.

1a. If the DSL is unavailable, report to the headteacher.

1b. If neither is available, you must immediately refer the matter to children's social care and/or the police if you believe a child is at risk of harm or in immediate danger. Any individual can make such a referral.

2. Document all details related to the concern and/or referral on CPOMS as soon as possible, and no later than the end of the working day.

SECTION B: Responding to a Disclosure of a Safeguarding Issue by a Child

1. Listen attentively and take the disclosure seriously, allowing the child sufficient time to express themselves without asking leading questions.
2. Remain calm and do not display shock or distress.
3. Acknowledge the child's decision to confide in you and refrain from suggesting they should have disclosed sooner.
4. Explain the next steps, clarifying that you are obligated to share this information. Do not promise confidentiality.
5. Record the conversation at the earliest opportunity on CPOMS, prior to the close of the working day. Ensure an objective account is provided, delineating direct quotations from the child using quotation marks.
6. Follow the reporting procedures outlined in Section A.

SECTION C: Addressing Concerns Not Based on Direct Disclosure

Be mindful that some children may:

- Not feel prepared or know how to disclose abuse, exploitation, or neglect.
- Fail to identify their experiences as harmful.
- Feel embarrassed, ashamed, or threatened. These feelings may arise due to vulnerability, disability, sexual orientation, or language barriers.

These factors must not deter you from exercising professional curiosity. If you have concerns about a child, consult the DSL and ensure these concerns are recorded on CPOMS promptly. If necessary, follow the processes described in Section A.

Copyright – to be used only with prior and express permission of Keys.

SECTION D: Female Genital Mutilation (FGM)

Any teacher who becomes aware of or has credible evidence that a child has been subjected to FGM, as defined below, is legally required to report this directly and immediately to the police. This statutory duty carries disciplinary consequences for non-compliance. The requirement does not apply in cases where a pupil is at risk of FGM or suspicion exists without confirmation. Staff must not physically examine pupils. If there is risk or suspicion, teachers should follow the procedures detailed in Section A.

Unless instructed otherwise, staff should also discuss the case with the DSL and involve children's social care as appropriate.

Definition of FGM:

In accordance with Keeping Children Safe in Education, FGM includes "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs."

FGM is illegal in the UK and constitutes a form of child abuse with serious, long-term consequences. It may also be referred to as 'female genital cutting,' 'circumcision,' or 'initiation.'

Any other staff member who discovers that FGM appears to have been performed on a pupil under 18 must inform the DSL and proceed according to Section A.

Any staff member who suspects a pupil is at risk of FGM or suspects FGM has occurred must speak to the DSL and observe local safeguarding protocols.

SECTION E: Concerns Related to Radicalisation, Extremism, or Terrorist Activity

Initially, follow the procedures set out in Sections A and B. The Department for Education provides a dedicated helpline (020 7340 7264) for school staff and governors to report concerns regarding pupil extremism. Alternatively, concerns can be emailed to counter.extremism@education.gov.uk.

In emergencies, contact 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Believe any person is in immediate danger;
- Suspect someone is planning to travel to join an extremist group;
- Observe or hear anything potentially related to terrorism.

If any further or new information comes to light when a prevent referral is being assessed, this must be passed on to Police.

Copyright – to be used only with prior and express permission of Keys.

Appendix 2: Recording and Storing Data

Record-keeping

Pupil protection and safeguarding records will be maintained using CPOMS.

All safeguarding concerns, related discussions, decisions, and the rationale for those decisions must be documented in writing. If there is uncertainty regarding whether to record specific information, staff should consult with the DSL for guidance.

Records shall include:

- A clear and comprehensive summary of each concern.
- Details outline how the concern was addressed and resolved.
- Documentation of actions taken, decisions made, and outcome.
- Each pupil will have a dedicated child protection file.

Non-confidential records will remain readily accessible. Confidential documentation will be stored securely and made available only to individuals with a legitimate or professional need to access them.

Safeguarding records pertaining to individual children will be retained for an appropriate period following their departure from the school.

When a pupil with current or previous safeguarding concerns transfers to another institution, the DSL will ensure their child protection file is transferred promptly, securely, and separately from the main pupil file. Electronic transfer via CPOMS will be utilised.

To facilitate support for the child upon arrival at the new school or college, files should be transferred within:

- **5 days** for in-year transfers, or
- **The first 5 days** of the start of a new term

For cases involving significant or complex concerns, or where social services are involved, the DSL will directly communicate with the receiving school's DSL to provide pertinent information, allowing for necessary preparations to safeguard the child.

Where staff, volunteers, agency personnel, or visitors have a concern, it must be recorded on a paper form and submitted to the DSL for inclusion in CPOMS. The DSL will enter details from the written record and scan it into the pupil's CPOMS file.

Copyright – to be used only with prior and express permission of Keys.

Appendix 3: Recruitment and Selection Process

To recruit individuals appropriately, all staff involved in recruitment and employment for positions working with children will be required to complete relevant safer recruitment training.

Application Forms

Application forms will:

- Include a statement indicating that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity with children, when applicable.

Shortlisting

The shortlisting process will:

- Review any inconsistencies, identify gaps in employment, and examine provided reasons.
- Assess potential concerns.
- Public online check.

Shortlisted candidates will be requested to:

- Complete a self-declaration of their criminal record or any information that may make them unsuitable to work with children, allowing for discussion during the interview stage.

The requested information will include:

- Criminal history.
- Inclusion on the barred list.
- Prohibition from teaching.
- Criminal offences committed in any country in accordance with laws applicable in England and Wales.
- Any relevant overseas information.

Candidates will also sign a declaration confirming the accuracy of the information provided.

An online search will be conducted on shortlisted candidates to identify publicly available incidents or issues. Candidates will be notified that these checks are part of the standard due diligence process.

Seeking References and Checking Employment History

References will be obtained before interviews, with any concerns addressed with referees and discussed with the candidate during the interview.

Copyright – to be used only with prior and express permission of Keys.

Reference procedures will:

- Not accept open references.
- Involve direct communication with referees and verification of reference information.
- Ensure references originate from the candidate's current employer and are completed by a senior individual. If the referee is school-based, confirmation from the headteacher regarding disciplinary investigation accuracy will be sought.
- Verify the most recent relevant period of employment if the candidate is not currently employed.
- Obtain a reference from the last employer where the candidate worked with children if they are not currently doing so.
- Compare application form details with reference information, resolving any inconsistencies with the candidate.
- Address and resolve all concerns prior to appointment confirmation.

Interview and Selection

During interviews, the following will occur:

- Inquiry into gaps in employment or frequent changes in employment/location, requesting candidates to provide explanations.
- Examination of potential areas of concern to assess suitability for work with children.
- Documentation of all the information considered and decisions made.

Pre-appointment Vetting Checks

All details regarding vetting procedures are recorded in the school's single central record (SCR), and relevant documentation is stored in individual personnel files. Procedures adhere to statutory requirements and best practices for document retention as outlined below.

New Staff

Employment offers are subject to satisfactory completion of all necessary pre-employment checks. When recruiting new staff, the following steps will be taken:

- Identity verification.
- Obtaining an enhanced DBS certificate via the applicant, including barred list information for those engaged in regulated activity (see definition below). The certificate will be obtained before or as soon as practicable after appointment, using the DBS update service if applicable. Copies of the certificate will not be retained for more than six months, though records of the check, its outcome, and the recruitment decision may be kept.
- Conducting a separate barred list checks if work in regulated activity commences prior to receipt of the DBS certificate.
- Verifying mental and physical fitness to undertake job responsibilities.

Copyright – to be used only with prior and express permission of Keys.

- Checking the right to work in the UK, with verification retained for the duration of employment and two years afterward.
- Confirming professional qualifications where relevant.
- Ensuring teachers are not subject to a prohibition order.
- For management positions, candidates must not be subject to a section 128 prohibition from management direction issued by the Secretary of State.
- Conducting additional checks for candidates who have lived or worked outside the UK, as appropriate. These may include:
    - Criminal record checks for overseas applicants for all staff, including teaching positions.
    - For teaching roles: obtaining confirmation from the relevant professional authority in the foreign country that no sanctions or restrictions have been imposed, and there is no reason to consider the individual unsuitable to teach.

Regulated Activity refers to individuals who:

- Regularly teach, train, instruct, care for, or supervise children in a school or college;
- Perform paid or unsupervised unpaid work regularly in settings where such work provides potential contact with children;
- Provide intimate or personal care, or participate in overnight activities, even on a one-time basis and regardless of supervision.

Existing Staff

Relevant checks may be conducted for existing staff under certain circumstances, treating them as new staff members, such as when:

- Concerns arise regarding their suitability to work with children;
- Individuals transfer from a non-regulated to a regulated activity role;
- There is a break in service of twelve weeks or longer.

Referrals to the DBS will be made for anyone considered to have harmed or posed a risk of harm to a child or vulnerable adult, where:

- There is belief the individual has engaged in relevant conduct;
- They have received a caution or conviction for an offence specified under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009;
- The 'harm test' is met (i.e., the individual may harm or place a child or vulnerable adult at risk);
- The individual is removed or would have been removed from regulated activity (paid or unpaid) had they not left.

Agency and Third-party Staff

Written notification will be obtained from any agency or third-party organisation

Copyright – to be used only with prior and express permission of Keys.

confirming completion of the required safer recruitment checks equivalent to those conducted by the school. Identity verification of the individual presenting for work will also be undertaken to ensure consistency with the completed checks.

Contractors

Arrangements will be made to ensure that contractors or their employees working at the school have received an appropriate level of DBS check if unsupervised, as follows:

- Enhanced DBS check with barred list information for contractors involved in regulated activity.
- Enhanced DBS check (excluding barred list information) for other contractors not engaged in regulated activity but whose work involves regular contact with children.

Contractors without these checks will not be permitted to work unsupervised or participate in regulated activity. The identity of all contractors and their employees will be verified upon arrival at the school.

Trainee/Pupil Teachers

For salaried applicants for initial teacher training, all necessary checks will be carried out directly by the school. For fee-funded trainee teachers, written confirmation from the training provider will be obtained verifying that all required checks have been completed and the trainee has been deemed suitable to work with children.

Volunteers

Unchecked volunteers will not be left unsupervised. An enhanced DBS check with barred list information will be obtained for all volunteers new to regulated activity.

Governors

All governors will receive an enhanced DBS check with barred list information. This check will also apply if a governor is involved in regulated activity. All governors are subject to a section 128 check, as a section 128 direction disqualifies an individual from holding a position as a maintained school governor. The chair of the board's DBS check will be countersigned by the Secretary of State.

All proprietors, trustees, local governors, and members will undergo the following checks:

- Section 128 check (to assess prohibition under section 128 of the Education and Skills Act 2008).
- Identity verification.
- Right to work in the UK.
- Additional relevant checks if they have lived or worked outside the UK.

Copyright – to be used only with prior and express permission of Keys.

Staff Working in Alternative Provision Settings

When a pupil is placed with an alternative provision provider, we require written assurance from the provider confirming that they have conducted the necessary safeguarding checks on all individuals working there, in accordance with the standards we would apply ourselves. And the DSL or headteacher will visit the provision to ensure its suitability and its safeguarding culture.

Adults Who Supervise Pupils on Work Experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity. We will also visit that workplace setting to ensure its suitability for the pupil and that appropriate safeguarding, health and safety, risk assessment, supervision and reporting arrangements are in place to protect children from harm.

Copyright – to be used only with prior and express permission of Keys.

Appendix 4

Broadwood School
252 Moor End Road
Halifax
HX2 0RU

KEYS DESIGNATED OFFICERS:	JAMES MADINE (Chair of Governors) JULIE HAMILTON (Safeguarding Governor/Director)	07773 474876 07789 996850
SCHOOL DESIGNATED SAFEGUARDING LEAD	Richard Mulhall	07488339672
SCHOOL DEPUTY DESIGNATED SAFEGUARDING LEADS	Richard Duffy	07768258532
SCHOOL MENTAL HEALTH CHAMPION	Nichola Wilkinson	01217287800
SCHOOL PREVENT LEAD	Richard Mulhall	07488339672

Responsibilities of Safeguarding Champions include:

- Ensuring Keys full compliance with the standards set by the Local Safeguarding Children Partnership (LSCP) for managing allegations, as stipulated in Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026. This includes integrating LSCP procedures into Keys policies and practices.
- Guaranteeing that all staff members are informed of, and adhere to, protocols concerning allegations against adults working with or on behalf of children.
- Establishing robust systems within Keys to review cases, identify areas for improvement, and implement changes that enhance procedures and practices.
- Addressing and resolving any inter-agency challenges that may hinder the effective application of LSCP procedures.
- Ensuring that the designated roles are accurately incorporated within Keys policies and procedures.
- Maintaining effective arrangements for reporting and record-keeping across Keys.

Copyright – to be used only with prior and express permission of Keys.

Appendix 5 - Reporting and Referring Contact Information

For concerns relating to the Safeguarding of Children

Children Protection / Safeguarding Concerns – Not Involving Allegations Against Staff.

All safeguarding concerns must be reported immediately to the designated contact at the local authority where the school is located. For this school the host local authority is Calderdale. For out-of-hours situations, please notify the Emergency Duty Team (EDT).

The placing authority responsible for the affected child or children must also be informed. In out-of-hours cases, contact should be made with EDT.

For serious safeguarding incidents please escalate concerns using the Serious Incident Policy (HS/POL/045) available on RADAR.

Host Local Authority Children's Safeguarding Lead(s)name(s):	Calderdale Local Authority Steve Barnes Schools Safeguarding Adviser
Safeguarding Team Telephone contact:	01422 393336
Safeguarding Team email contact:	Schoolsafeguarding@calderdale.gov.uk
Safeguarding Team Out of Hours Duty Desk contact number:	Emergency: 01422 288000

Copyright – to be used only with prior and express permission of Keys.

For Allegations And Concerns Against Staff

All allegations involving a member of staff must be reported to the Local Safeguarding Children's Partnership Designated Person, specifically, the LADO (Local Authority Designated Officer). The name and contact information for your area's LADO are provided below.

In addition, the placing authority responsible for the child or children involved must be informed. If outside normal working hours, please notify the Emergency Duty Team (EDT).

For serious safeguarding incidents please escalate concerns using the Serious Incident Policy (HS/POL/045) available on RADAR.

Local Authority Name	Calderdale Council
LADO Name(s)	Jane Darrington
LADO Contact number (s)/email	01422 394055 ladoadmin@calderdale.gov.uk
Online referral form location (weblink)	https://safeguarding.calderdale.gov.uk/report-concerns

Copyright – to be used only with prior and express permission of Keys.

Appendix 6 – Contextual Safeguarding Information and Location Risk Assessment for Broadwood School

To be completed at the start of the school year and reviewed termly by DSL then shared with staff as appropriate. Templates are completed in full and updated with information from local sources such as police, LA safeguarding teams, and community partners.

The local area context:

Local public transport stations and stops nearby.
Outside the school on Moor End Road. Available buses. 255 (Leeds to Halifax) 548 (Halifax Town Centre) 576 (Bradford to Halifax) TS3 (Halifax Train Station)

Any known destinations, if children abscond: Woodland area close to school along Moor End Road

Any information about known gangs (or unaffiliated groups of younger people) operating around the school and potential disputes arising: None Known

Any criminality hot spots in the area:
Violent and Sexual Offences
Anti-Social behaviour
Drugs
Public Order

Any known drug hot spots in the area:
Queens Road, Halifax (21-minute walk from school)
Hopwood House, Halifax

Any physical risks present in the school environment:
None
Any other additional intelligence shared by fellow professionals that impacts on the safeguarding of pupils at the school:
None

Any physical risks present in the school environment:
None

Copyright – to be used only with prior and express permission of Keys.

Appendx 7: Safeguarding Oversight and Information for Display

The Designated Safeguarding Lead (DSL) is the primary safeguarding officer for the school. Any additional staff trained to this level serve as deputies and provide cover in the DSL's absence.

It is essential that the DSL demonstrates comprehensive oversight of all safeguarding incidents occurring within the school. The DSL is responsible for being fully informed about every referral and for ensuring that all concerns are appropriately addressed and followed up.

Schools must provide a dedicated staff noticeboard and one or more pupil-friendly noticeboard(s), each clearly labelled and not used for any unrelated information.

Each noticeboard should include:

- The names and roles of the DSL, Deputy DSL(s), and mental health leads. Only one individual may serve as the lead DSL.
- Contact details for senior leaders overseeing safeguarding, including the Safeguarding Governor.
- Contact information for designated local authority safeguarding contacts, as well as details for Ofsted, the police, and Childline (for pupils).
- A copy of the school's safeguarding policy and any appendices.
- The latest version of KCSIE 2026.
- Information identifying relevant key policies such as:
    - Whistleblowing Policy
    - Grievance Policy

Safeguarding Training
All new staff members receive safeguarding training as part of their induction process. All staff participate in face-to-face safeguarding refresher training on an annual basis.

In addition, staff are required to complete mandatory online safeguarding modules covering:

- Female Genital Mutilation (FGM).
- Child Sexual Exploitation (CSE).
- Child Criminal Exploitation (CCE).
- County Lines.
- Child-on-Child Abuse.
- Neglect.
- Honour-Based Abuse and Forced Marriage.
- Serious Youth Violence.
- Sexual Violence and Harassment.
- Online Abuse and Internet Safety.

The Prevent Duty

Completion of the Prevent Duty training course is mandatory for all staff members.

Copyright – to be used only with prior and express permission of Keys.

Appendix 8: - Checklist for Staff and Governors

This checklist outlines essential responsibilities, protocols, and statutory references derived from the safeguarding policy. It is intended for use during staff induction and as part of ongoing refresher training.

Statutory References

- Ensure familiarity with 'Keeping Children Safe in Education (KCSIE) 2026'.
- Adhere to 'Working Together to Safeguard Children (2026)'.
- Understand obligations under the Children Act 1989 and 2004.
- Be cognisant of the Prevent Duty as stipulated by the Counterterrorism and Security Act 2015.
- Comply with the Equality Act 2010 and the Human Rights Act 1998.
- Have knowledge of the Independent School Standards (Part 3).

Roles and Responsibilities

- All staff are required to read all of Part One of KCSIE, annually and provide a signed declaration of comprehension.
- The Designated Safeguarding Lead (DSL) must be a senior member of the leadership team, responsible for overseeing all aspects of safeguarding and child protection.
- Deputy DSLs are to support the DSL and act on their behalf when necessary.
- Governors are expected to appoint a designated safeguarding lead and oversee full implementation of safeguarding policies.
- The Headteacher is responsible for ensuring staff receive appropriate training and that safeguarding policies are effectively communicated to parents and carers.
- The Education Director serves as an alternate DSL if required.
- Staff are to Ensure that no Pupil or Staff member has a mobile phone on in school, and visitors should be advised to have on silent or turned off, and not to use in areas that pupils are in.

Safeguarding Procedures

- All concerns must be promptly reported to the DSL or Deputy DSL.
- Safeguarding concerns should be recorded using CPOMS.
- Immediate referral to children's social care or the police is required if a child is at risk of harm.
- Follow established procedures for disclosures, FGM, extremism, and mental health issues.
- Adhere to guidance on managing low-level concerns and allegations.
- Conduct contextual safeguarding risk assessments as required.

Child-on-Child Abuse and Online Safety

- Proactively challenge inappropriate behaviour and language among pupils.
- Deliver education to pupils regarding consent, healthy relationships, and report any incidents of sexual harassment, violence, or sexting directly to the DSL.
- Maintain effective filtering and monitoring systems for online safety.
- Support both victims and alleged perpetrators through comprehensive

Copyright – to be used only with prior and express permission of Keys.

risk assessments and intervention plans.

SEND and Vulnerable Pupils

- Offer additional pastoral support and assign key workers for pupils with SEND.
- Remain vigilant to barriers to disclosure and indicators of abuse within vulnerable groups.
- Implement tailored safeguarding adaptations in RSHE and tutorial programmes.
- Our school is committed to supporting gender questioning children. We recognise the importance of creating a safe and inclusive environment where all children feel respected and supported. Staff will receive training on how to support gender questioning children, ensuring that their needs are met, and they feel safe within the school community.

Training and Monitoring

- Complete mandatory induction and annual safeguarding training.
- Undertake Prevent awareness training as required.
- Governors must participate in safeguarding training upon induction and at regular intervals thereafter.
- The DSL and deputies are required to complete Level 3 safeguarding training biennially.

Review and update the safeguarding policy and associated procedures annually.

Copyright – to be used only with prior and express permission of Keys.

Appendix 9: School Specific Mental Health Guidance (updated for 2026 in line with KCSIE 2026)

Broadwood School recognises that mental health concerns may quickly become safeguarding concerns and puts the following plans in place.
Staff receive training on how to remain alert to indicators such as children or young people displaying any of the following:

- self-injurious behaviour.
- suicidal thoughts (ideation).
- Hopelessness.
- Withdrawal.
- sleep difficulties.
- eating difficulties.
- significant behavioural change.
- risk taking behaviour (including use of drugs and/or alcohol).

The link person on site for any concerns regarding the above is: Richard Mulhall, Designated Safeguarding Lead, or in their absence, Richard Duffy Deputy Headteacher and Deputy DSL. The mental health first aider at the school is Rana Aminy-Khiabany, Pastoral Lead.

Keys also have Specialist Advisors who have specific areas of expertise. These are:

- Self-injurious behaviour/suicide prevention – Helen Stewart,
- Substance Misuse – Fran Gracie,
- Harmful Sexualised Behaviour – Gayle Bradbury,
- Criminal exploitation – Katie Proudman,
- Police Liaison – Steve Challinor,

The Keys Education Clinical Team provide support in a number of areas related to mental health support including hopelessness, withdrawal, suicidal thoughts, sleep difficulties, behaviour change and other needs relating to low mood.

The clinical team for Broadwood School is EP - Shona Cameron; Assistant EP - Ellie Rodway-Barnett

Immediate Risk
Where a child is at immediate risk during the school day (and in school's care)

- Emergency services will be contacted
- Parents/carers informed (unless for any reason it is deemed unsafe to do in consultation with Regional Director/Education Director, so in which case social care contact will be made)
- DSL and Headteacher informed immediately
- Urgent medical intervention sought where appropriate

Copyright – to be used only with prior and express permission of Keys.

Where a child is at immediate risk (outside school hours):

- Emergency services will be contacted (if not already aware)
- Parent Carer informed immediately (if not already aware)
- Social Care will be contacted and appropriate support for family sought immediately.

School-based mental health interventions

In line with KCSIE 2026, any mental health support provided by the school will be:

- Evidence-based, appropriate, safe and regularly reviewed.

All interventions provided by Broadwood School come from the pre-planned therapeutic curriculum strand in partnership with Keys Education Clinical Team. Broadwood School takes part in regular multi-disciplinary meetings and clinical reviews to ensure that ongoing support meets the above criteria.

Copyright – to be used only with prior and express permission of Keys.

Appendix 10

[Pupil Name] – Safety Plan Type of Risk/s:_____

Introduction:

[Include pupil name and why the safety plan is in place, below is an example]

Example: My name is [pupil name]. I am struggling with [needs and general risk, for example, my mental health/my This is my safety plan. I need you to read this plan and understand the best way to support me at school, especially when I am struggling.

My history:

[Include a brief overview of the contextual safeguarding history that the pupil feels comfortable with you sharing, below is an example]

Example: I have experienced a lot of ***school-based trauma*** *including being the victim of an assault by a teacher by when I was very young, multiple placement breakdowns, and* ***rejections*** *from staff and peers. As a result of this,* ***I find it hard to trust people.***

How I see the world – this might impact what I do or say:

[Include some key bullet points around that support the pupil's understanding of the world around them, below is an example]

- *[example] I have a strong sense of justice. I need to understand why decisions have been made not just about me, but about other people.*
- *[example] I am loyal to my friends and safe people, so I find it hard not to get involved if something involves them.*

What would I like adults to know about me?

[Work with the child to include 2 or 3 key points here, that they think are really important to know about this risk and how it impacts them, below is an example]

- [example] I don't like over reactions or under reactions.
- [example] I use negative behaviour to get access to safe people instead of asking.
- [example] I feel embarrassed when I've hurt someone. Even if you don't think I do.

Early signs that I am not doing okay:

[Work with the child to identify some keep indicators that their risk level is increasing, below is an example]

- [example] I start tapping my feet or my hands a lot and start pacing around

My 2,3,4 Safety Plan

TWO places I feel safe that I can go to, or you can take me to

1.
2.

THREE things that can people do to help me

1.
2.

Copyright – to be used only with prior and express permission of Keys.

3.

FOUR people that I trust, who you can get or call on the phone to support me

1.
2.
3.
4.

Copyright – to be used only with prior and express permission of Keys.

11.Version Control

This document can be found in Radar and is published on the school website. This policy is reviewed annually, or sooner if legislation or statutory guidance changes. The named owner for review at Broadwood School is the headteacher and Martin Keightley Safeguarding Assurance Manager.

Copyright – to be used only with prior and express permission of Keys.