Keys Inclusion Pathways (KIP) Safeguarding Policy

Policy Number:	ED/KIP/POL/	Policy Owner Job Role	Martin Keightley
Issue Number:	1	Ratified By	Matt Tiplin
Issue Date:	01-09-2026	Service Type:	Education
		Applicable Services:	Keys Inclusion Pathway
Contributors	Martin Keightley Nina Livermore Matt Tiplin		
Mandatory Policy	Yes, x No		
Relevant Regulations	Keeping Children Safe in Education 2026		

Table of Contents

Section	
1	**Supporting Documents**
2	**Aims**
3	**Safeguarding Principles**
4	**Roles and Responsibilities**
5	**Safer Recruitment**
6	**Early Help**
7	**Alternative Provision safeguarding Provisions**
8	**Monitoring Arrangements**
9	**Off Site Education**
10	**Missing Learner Procedure**
11	**Online, Digital and Remote Learning**
12	**Attendance**
13	**Child on Child Abuse**
14	**Learners at Risk**
15	**Mental Health and Emotional wellbeing**
16	**Professional Boundaries**
17	**Record Keeping**
18	**Training**
19	**Quality Assurance**
20	**Policy Review**
21	**Appendix**
22	**Version Control**

1. Supporting Documents

This policy is informed by and complies with:

Statutory Guidance

- Keeping Children Safe in Education (KCSIE) 2026 (effective 1 September 2026) including specific sections relating to:

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

- Alternative Provision
- Online Safety
- Child-on-Child Abuse
- Filtering and Monitoring
- Attendance
- Early Help
- Safer Recruitment
- Children Missing Education
- Multi-Agency Working
- Generative AI Risks
- Gender Questioning Pupils
- Mental Health Support
- Vulnerable Groups

- Working Together to Safeguard Children (2026)
- Independent School Standards Regulations (2014) – Part 3 Welfare, Health and Safety
- Independent School Standards Guidance (2026)
- Children Act 1989 and 2004
- Education Act 2002
- Education Act 1996
- Equality Act 2010
- Human Rights Act 1998
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Data Protection Act 2018 / UK GDPR

Alternative Provision Guidance

- Alternative Provision Statutory Guidance (DfE 2025)
- Non-School Alternative Provision: Voluntary National Standards (2025)

2. Aims

This Safeguarding Policy has been developed with a High Bar for safeguarding children, the statutory guidance outlined in Keeping Children Safe in Education (KCSIE) 2026, which all schools and colleges in England must follow when safeguarding and promoting the welfare of children under 18. It also aligns with the multi-agency framework established by Working Together to Safeguard Children (2026), ensuring effective collaboration among all safeguarding partners and compliance with the Independent School Standards (Part 3 – Welfare, Health and Safety of Pupils). This framework sets out clear expectations for safeguarding arrangements, staff training, and leadership oversight.

This Safeguarding Policy will be regularly reviewed and updated to reflect the latest statutory guidance and best practices. We will incorporate technical changes from the Keeping Children Safe in Education 2026 guidance to improve the clarity and effectiveness of our

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

safeguarding practices. This includes updating terminology, procedures, and training materials to ensure that our policy remains comprehensive and effective.

To maintain robust and up-to-date practices, we continually review and revise our policies in line with new statutory requirements or emerging guidance, referencing additional documents and updates as they become available. This ongoing process reassures stakeholders that our safeguarding approach remains thorough, compliant, and responsive to the evolving landscape of child protection. In alignment with the proposed Children's Wellbeing and Schools Bill, our school is committed to enhancing the wellbeing of all children. We will implement practices and policies that promote mental health and wellbeing.

3.Safeguarding Principles

We will:

- Put the needs and welfare of children first.
- Maintain a culture of vigilance.
- Act immediately on concerns.
- Work in partnership with parents and external agencies.
- Promote resilience, safety and wellbeing.
- Ensure children know how to seek help.
- Provide robust protection in both physical and digital environments.
- Support children who may be particularly vulnerable due to attendance in alternative provision.

4. Roles and Responsibilities

Proprietor/Governing Body - Keys

Will ensure:

- Compliance with KCSIE 2026.
- Compliance with Independent School Standards.
- Effective safeguarding governance.
- Appropriate safeguarding resources.
- Annual review of safeguarding arrangements.
- Annual review of filtering and monitoring systems as required by KCSIE 2026.

Designated Safeguarding Lead (DSL)

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

The DSL of a KIP service will:

- Lead safeguarding arrangements.
- Manage referrals.
- Maintain child protection records.
- Liaise with safeguarding partners.
- Monitor vulnerable learners.
- Oversee safeguarding within off-site and online learning.
- Ensure quality assurance of commissioned alternative provision.

All Staff

All staff must:

Read and understand KCSIE 2026 Part One. (KCSIE 2026 requires all staff to read Part One of the guidance)

- Report concerns immediately.
- Maintain professional curiosity.
- Follow reporting procedures.
- Promote safeguarding in daily practice.

5. Safer Recruitment

The organisation will:

- Conduct Enhanced DBS checks.
- Verify identity and qualifications.
- Undertake barred list checks where applicable.
- Perform online searches on shortlisted candidates.
- Maintain an accurate Single Central Record.
- Obtain safeguarding assurances from third-party providers.

All recruitment will be undertaken in accordance with KCSIE 2026 Safer Recruitment requirements.

6. Early Help and Child Protection

Staff must recognise indicators of:

- Physical abuse

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

- Emotional abuse
- Sexual abuse
- Neglect
- Child criminal exploitation
- Child sexual exploitation
- Radicalisation
- Domestic abuse
- Honour-based abuse
- Female Genital Mutilation (FGM)
- County Lines
- Modern slavery
- Forced marriage

Concerns will be recorded promptly and referred to the DSL.

Where appropriate, Early Help intervention will be considered before risks escalate.

7. Alternative Provision Safeguarding Requirements

Children educated at alternative provision settings remain the responsibility of the commissioning organisation.

In accordance with KCSIE and Alternative Provision Guidance:

The organisation will:

Before Placement

Will carry out:

- Needs assessment.
- Safeguarding risk assessment.
- Health and safety checks.
- Quality assurance visit.
- Confirmation of staffing structure.
- Verification of safeguarding arrangements.

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

8. Monitoring Arrangements

The organisation will:

- Conduct regular safeguarding audits.
- Review attendance weekly.
- Monitor incidents.
- Complete quality assurance visits.
- Record pupil location while engaging with the service
- Review safeguarding standards annually.

9. Community based Education and Educational Visits

Where learning occurs away from a main site, but are community based, to help support the young person, the organisation will ensure;

Risk Assessment

The Missing, Entrapped, Trafficked Team, work closely with the Police, around CCE, which is an In-House Specialist Team, who work with KIP and support with -

- Location risks.
- Environmental hazards.
- Missing child risks.
- Medical needs.
- Staffing ratios.
- Behaviour concerns.
- Transport arrangements.
- Lone working risks.

Supervision

Staffing levels will reflect:

- Pupil need.
- Vulnerability.
- Behaviour risk.
- Activity undertaken.

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

Missing Learner Procedures

Immediate action will include:

- Search procedures.
- Contacting parents/carers.
- Notifying senior leaders.
- Contacting police and Local Authority where appropriate.
- Recording all actions taken.

11. Online, Digital and Remote Learning Safeguarding

The organisation recognises online education presents significant safeguarding challenges.

Online safeguarding applies to:

- Live lessons
- Virtual classrooms
- Video conferencing
- Online tutoring
- Remote intervention

Expectations

Staff must:

- Use approved platforms as defined by Keys.
- Maintain professional boundaries as defined by Keys staff code of conduct.
- Use organisation accounts only.
- Record concerns immediately using the chosen system (2026 CPOMS).
- Avoid personal devices for non-approved use.
- Ensure appropriate visibility during learning sessions.

Online Safety

In line with KCSIE 2026, online safety is approached through:

Education

Teaching learners about:

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

- Online abuse
- Safe Internet practice and Data hygiene
- Grooming
- Sextortion
- Deepfakes
- AI generated harm
- Privacy settings
- Online relationships
- Misinformation
- Disinformation
- Cyberbullying

Filtering and Monitoring

The organisation will:

- Implement filtering systems on company provided equipment.
- Monitor online activity on company provided equipment.
- Specify requirements for equipment where devices are provided by a third party.
- Review systems and processes annually.
- Report concerns immediately.

Annual governance review of filtering and monitoring arrangements is expected under KCSIE 2026. And will be carried out and recorded at a minimum of three times a year.

KCSIE 26 places increased emphasis on AI, deepfakes, online manipulation and misinformation risks. Keys agrees with this increased emphasis and acts to minimise the risk to children we serve through technical and educational approaches.

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

12. Attendance and Children Missing Education

Poor attendance can indicate safeguarding concerns. KIP supports children who have or are exhibiting behaviours associated with one or more factors that increase their vulnerability. Our non-school alternative provision services exist to support children, including those with SEND, to access education and reintegrate into full-time education, thus reducing the likelihood of a child become CME. We monitor children's engagement with their scheduled tutoring sessions closely, scrutinising data for any signs of concern and drawing on feedback from children and tutors to understand new or emerging risks.

Staff will monitor:

- Persistent absence and last-minute cancellations.
- Missing sessions, particularly if without a valid reason.
- Late arrival patterns.
- Staff will monitor inappropriate transitions, and liaise with local authorities where appropriate.
- Learners failing to engage online.

Safeguarding reviews will be triggered where patterns indicate increased risk.

KCSIE 2026 clarifies that children absent from education may be experiencing safeguarding harm.

13. Child-on-Child Abuse

The organisation adopts a zero-tolerance approach.

This includes:

- Sexual harassment.
- Sexual violence.
- Harmful sexual behaviour.
- Physical abuse.
- Online abuse.
- Prejudiced behaviour.
- Bullying.

All incidents will be:

- Taken seriously.

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

- Recorded.
- Investigated.
- Managed through safeguarding procedures.

14. Learners at Increased Risk

Additional vigilance will apply to:

- Children with SEND.
- Looked After Children.
- Previously Looked After Children.
- Children with a Social Worker.
- Young carers.
- Children experiencing mental ill health.
- Children affected by exploitation.

15. Mental Health and Emotional Wellbeing

Mental health difficulties may be indicators of safeguarding concerns.

Staff will:

- Recognise warning signs.
- Refer concerns appropriately.
- Engage specialist support.
- Consider safeguarding implications of self-harm, suicidal ideation and trauma.

16. Professional Boundaries

Staff must:

- Maintain professional conduct.
- Complete mandatory safeguarding training (see 18)
- Avoid inappropriate communication.
- Use approved communication systems only.
- Report low-level concerns.

Any concern relating to staff conduct will be managed under allegations and low-level concern procedures. Concerns relating to staff who sit below the Senior Leadership Team, will be

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

referred to the DSL. The LADO (Local Area Designated Officer) may need to be contacted, to carry out an external/independent investigation.

17. Record Keeping

The organisation will maintain:

- Secure safeguarding records.
- Chronologies.
- Risk assessments.
- Alternative provision monitoring records.
- Online safety incident logs.
- Attendance monitoring records.

Records will be retained in accordance with safeguarding and data protection requirements.

18. Training

All staff will receive:

Induction

- KCSIE Part One.
- Safeguarding policy.
- Reporting procedures.
- Whistleblowing.
- Online and in-person training

Annual Updates

- Child protection.
- Online safety.
- Prevent.
- Child-on-child abuse.
- Alternative provision safeguarding.
- Emerging risks.

DSLs will receive advanced safeguarding training every two years with interim updates.

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

19. Quality Assurance and Monitoring

The organisation will complete:

- Annual safeguarding audit.
- Online safety reviews.
- Termly safeguarding reports.
- Annual policy review.

20. Policy Review

This policy will be reviewed:

- Annually.
- Following updates to KCSIE.
- Following safeguarding incidents.
- Following inspection recommendations.
- Following legislative change.

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 these 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 or DDSL (See Appendix 4).

2. If the DSL and DDSL are unavailable, contact the Duty Line (See Appendix 4).

3. If none of these options are 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. (Please see Appendix 5 for information about area specific referral contact details)

4. Notify the referring/commissioning agency of the concern as a matter of priority.

5. 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.

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

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.

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 noncompliance. 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.'

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

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 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 to the police.

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 final outcomes

which Is recorded on CPOMS.

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

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

period following their departure from the service.

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.

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

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

- 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.

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 KIP 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

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

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 check if work in regulated activity commences prior to receipt of the DBS certificate.
- Verifying mental and physical fitness to undertake job responsibilities.
- 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.
- 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.
    - For management positions, candidates must not be subject to a section 128 prohibition from management direction issued by the Secretary of State.

Regulated Activity refers to individuals who:

- Regularly teach, train, instruct, care for, or supervise children.
- 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:

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

- There is belief that 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 confirming completion of the required safer recruitment checks equivalent to those conducted by the Organisation. Identity verification of the individual presenting for work will also be undertaken to ensure consistency with the completed checks.
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 Group

Appendix 4 – Keys Tuition and Engage

Keys Inclusion Pathways key safeguarding contacts			
DSL	**Marie Hockley**	07749433545	marie.hockley@keyseducation.ac.uk
DDSL	**Ailsa Jackson**	07759369607	ailsa.Jackson@keyseducation.ac.uk
Assistant Director KiP	**Nina Livermore**	07712714571	nina.livermore@keyseducation.ac.uk

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.

Appendix 5 - Reporting and Referring Contact Information

Allegations 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).
- Please ensure the Red Flag procedure is followed to inform senior managers within Keys.

Safeguarding Children - Child 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 service is located (see table below for area specific information).
- For out-of-hours situations, please notify the Emergency Duty Team (EDT).

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

- 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.
- Please follow the Red Flag procedure to ensure senior managers within Keys are appropriately notified.

County	Safeguarding contact information
Suffolk	Professional Consultation Line (PCL) – 0345 606 1499 Customer First – 0345 606 1488 (Then complete MARF) MASH business support – 01473 263200 LADO – LADO@suffolk.gov.uk. 0300 123 2044
Norfolk	CADS – 0344 800 8021 LADO – LADO@norfolk.gov.uk. 0344 800 8020
Essex	Priority Hub – 0345 603 7627 Out of Hours – 0345 606 1212 LADO – LADO@essex.gov.uk. 0333 013 9797
West Northampton	MASH – 0300 126 7000 LADO – form on West Northamptonshire Safeguarding Children Partnership
Lincolnshire	Social Care – 01522 782 111 Out of Hours – 01522 782333 LADO – form on Lincolnshire County Council website
Newcastle	Emergency Duty Team – 0191 278 7878 Initial Response Service 0191 277 2500 LADO – Melanie Scott – 01912 772500. Lado@newcastle.gov.uk
Middlesborough	Multi-Agency Children's Hub – 01642 726004 Out of Hours – 01642 524552. Then complete SAFER referral on www.middlesborough.gov.uk LADO – 01642 065070

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

Appendix 6 - Contextual Safeguarding

Contextual safeguarding risk assessments are reviewed each term by the DSL and reported to governors. Templates are completed in full and updated with information from local sources such as police, LA safeguarding teams, and community partners. Review meetings are documented in minutes, and outcomes are communicated to staff where appropriate.

Appendix 7 – to be completed at the start of the academic year and reviewed termly by DSL then shared with staff as appropriate.

Contextual Safeguarding Information and Location Risk Assessment

The local area context

- Local bus routes and stops nearby
- Local train stations and stops nearby
- Any known destinations, if children abscond
- Any information about known gangs operating around the area and potential disputes arising
- Any criminality hot spots in the area
- Any known drug hot spots in the area
- Any physical risks present in the school environment
- Any other additional intelligence shared by fellow professionals that impact the safeguarding of student.
- Any known drug hot spots in the area
- Any physical risks present in the area environment
- Any other additional intelligence shared by fellow professionals that impact the safeguarding of student

Appendix 8: Safeguarding Oversight

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

The DSL is responsible for being fully informed about every referral and for ensuring that all

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

concerns are appropriately addressed and followed up.

Appendix 9 - 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
- Peer-on-Peer Abuse
- Neglect
- Honour-Based Abuse and Forced Marriage
- Serious Youth Violence
- Sexual Violence and Harassment
- Online Abuse and Internet Safety

Appendix 10 - 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 Group

Appendix 11

Please note: All body maps must be completed on CPOMS rather than on paper.

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

Body Map Guidance

Body maps serve as a tool to accurately document and illustrate observable signs of harm and physical injuries.

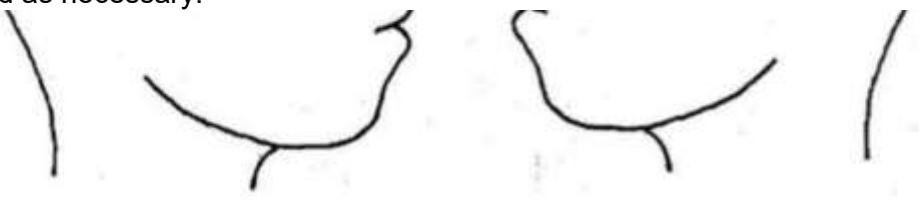
Clothing should not be removed for examination purposes unless access to the injury site is already available due to medical treatment.

***Photographic evidence of injuries or marks on a child should not be taken by any individual teacher, staff member, or the school. Instead, utilise the body map on CPOMS, like the one as illustrated below. All concerns must be reported and documented promptly through the appropriate safeguarding channels, such as MAST or the child's social worker if the case is already open with social care.**

When recording an injury, ensure you include the following details for each mark observed, including but not limited to: redness, swelling, bruising, cuts, lacerations, wounds, scalds, and burns:-

- Specific location of the injury on the body (e.g., upper outer arm/left cheek)
- Size of the injury in centimetres or inches
- Approximate shape (e.g., round, square, straight line)
- Colour(s) present; specify if multiple colours are involved
- Indication of whether the skin is broken
- Presence of swelling at the injury site or elsewhere
- Note any scabbing, blistering, or bleeding
- Description of cleanliness (e.g., presence of grit or fluff)
- Any restriction in mobility linked to the injury
- Whether the site feels hot to the touch
- Whether the child feels generally hot
- Whether the child reports pain
- Any changes in the child's posture or body shape

Ensure that both the date and time of the recording are clearly stated, along with the name and role of the individual making the record. Additional relevant comments should be included as necessary.



Appendix 12: Checklist for Staff and Governors

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

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 students 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

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

- Proactively challenges inappropriate behaviour and language among students
- Deliver education to students 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 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.

Appendix 13: I Specific Mental Health Guidance (updated for 2026 in line with KCSIE 2026)

Keys Inclusion Pathway recognises that mental health concerns may quickly become safeguarding concerns and puts the following plans in place.
Staff receive training on how to remain alerts 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)

Keys also has specialist advisors who have specific areas of expertise. These are:

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

Self-injurious behaviour – Fran Gracie
Suicide – Helen Stewart
Substance Misuse – Fran Gracie

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. And can get support from the Keys Education Clinical Team as required.

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 Head of Service/KIP Director, so in which case social care contact will be made)
- DSL informed immediately
- Urgent medical intervention sought where appropriate

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.

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

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

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:

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

[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.
3.

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

1.
2.
3.
4.

14.version Control

This document can also be found in the following locations and should be amended in the following

Source	Link
Radar	

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

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